

Jay M. Wolman (D.C Bar No. 473756)
Marc J. Randazza (*pro hac vice* pending)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, CT 06103
Tel: (702) 420-2001
ecf@randazza.com

Counsel for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

**DR. JEROME CORSI and LARRY
KLAYMAN,**

Plaintiffs,

vs.

**INFOWARS, LLC, FREE SPEECH SYSTEMS,
LLC, ALEX E. JONES, DAVID JONES, and
OWEN SHROYER,**

Defendants.

CIVIL ACTION NO. 1:19-cv-00656-ESH

MOTION TO DISMISS

We are most definitely in the wrong court. A New Jersey commentator and his Florida lawyer are suing three Texans and two Texas companies in the District of Columbia. There is no personal jurisdiction over the defendants, which Plaintiffs do not even claim in their Complaint, and venue in this forum is specious.

Not only should this matter not have been filed here, it should not be filed anywhere. None of the speech at issue constitutes actionable defamation, nor may it be repurposed to fit any other tort theory, including intentional infliction of emotional distress and assault. Further, the speech is not commercial speech under the Lanham

Act and, in the absence of any tort, it is not unfair competition. This matter should be dismissed.

STATEMENT OF POINTS AND AUTHORITIES

1.0 Factual Background

Plaintiffs Jerome Corsi and Larry Klayman generally allege that Defendants Alex Jones and Owen Shroyer broadcast radio and internet programs through Defendants Infowars, LLC, and Free Speech Systems, LLC. See Complaint, Dkt. No. 1, at ¶¶ 11-13. They further allege that Alex Jones and David Jones own, control, and operate Defendants Infowars and Free Speech Systems. *Id.* at ¶ 11.¹

Alex Jones, David Jones, and Owen Shroyer are all citizens of Texas. *Id.* at ¶¶ 8-10. Infowars and Free Speech Systems are limited liability companies organized and headquartered in Texas, owned by a Texan.² *Id.* at ¶¶ 6-9.

Plaintiffs make certain factual allegations as to the various defendants,³ asserting that their statements constitute defamation, intentional infliction of emotional distress,

¹ In actuality, Defendant Infowars plays no role in the broadcast or distribution of the identified programs and they are solely owned and controlled by Alex Jones. However, such facts are immaterial to the issues of personal jurisdiction and venue, even assuming all allegations by Plaintiffs were true.

² Although Alex Jones, not David Jones, is the actual owner of these entities, the citizenship of the companies remains that of Texas.

³ Plaintiffs also claim that Defendants worked in concert with non-party Roger Stone in violation of 18 U.S.C. § 1512. See Complaint at ¶¶ 36-37. No actual cause of action is asserted; moreover, this Court has properly held that, as to 18 U.S.C. §§ 1512 & 1513, "these criminal statutes do not confer a private right of action, so their venue provisions are irrelevant to a civil case." *Kazenercom Too v. Turan Petroleum, Inc.*, 590 F. Supp. 2d 153, 159 n.9 (D.D.C. 2008) (Huvelle, J.). To the extent Plaintiffs rest on allegations made in other litigation (Complaint at ¶ 36), no actual allegations regarding the claims at issue were presented in those matters. To establish personal jurisdiction based on Defendants' alleged conspiracy with the defendants in those matters, Plaintiffs "must plead *with particularity* the conspiracy as well as the overt acts within the forum taken in furtherance of the conspiracy." *Jungquist v. Sheikh Sultan Bin Khalifa Al*

unfair competition, and assault.⁴ They make the following allegations as to each Defendant:

a) Alex Jones:

I. October 26, 2018 Video: Says Dr. Corsi "seemed to be mentally degraded to the point of what I would call dementia"; says he saw Dr. Corsi at a steakhouse "on the ground" where staff "though he was dead in the elevator"; says he thinks Dr. Corsi suffered a stroke with the result that "whatever comes out of his mouth ain't the truth." Complaint at ¶¶ 42-46.

II. January 21, 2019 Video: Allegedly accused Dr. Corsi of being a "spook" and "not being able to walk." *Id.* at ¶¶ 68-69.

b) Owen Shroyer:

I. January 18, 2019 Video: Appeared on video with Roger Stone, a Florida citizen and resident,⁵ where **Mr. Stone allegedly said** Dr. Corsi was "fired from World Net Daily"; that Dr. Corsi perjured himself; that Dr. Corsi had a "feeble alcohol affected memory"; that Dr. Corsi "was perfectly prepared to bear false witness"; that Dr. Corsi made up a story; and that Dr. Corsi is "lying because his lips are moving"⁶

Nahyan, 115 F.3d 1020, 1031 (D.C. Cir. 1997) (emphasis added) (internal quotation marks omitted). Plaintiffs do not make such a particular pleading about any such overt acts in the District of Columbia.

⁴ Defendants deny that these statements are actionable and assert that the statements otherwise constitute speech protected by the First Amendment.

⁵ Dr. Corsi, through Larry Klayman, alleged Mr. Stone's residency and citizenship as being that of Florida in Paragraph 4 of their companion suit, *Corsi v. Stone*, Case No. 1:19-cv-00324 (D.D.C. Feb. 7, 2019).

⁶ Mr. Shroyer is not accused of saying or doing anything more than happening to be in the same frame as Stone when Stone made these statements.

II. January 18, 2019 Video: Appeared on video with Roger Stone, where **Mr. Stone allegedly said** that Mr. Klayman “never actually won a courtroom victory”; that Mr. Klayman was “ousted” from employment due to sexual misconduct; and that Klayman is a “piece of garbage”, “incompetent”, “a numbskull”, “an idiot”, “an egomaniac” and “could be the single worst lawyer in America” whose IQ is not “higher than 70”. Complaint at ¶¶ 48-63.

c) Infowars:

- I. January 17, 2019 Video: Roger Stone allegedly said that Dr. Corsi was “willing to bear false witness”. Complaint at ¶ 65.
- II. January 21, 2019 Video: Roger Stone allegedly said that Dr. Corsi had lied about Stone, Infowars, Alex Jones, and David Jones” and that Dr. Corsi was “deep state”, calling him a “fraudster” who “made up lies” in an “alcoholic haze”. *Id.* at ¶¶ 66-67.⁷

No other pertinent factual allegations are asserted,⁸ with none specifically about Free Speech Systems beyond being allegedly liable for the statements due to its corporate role in broadcasting them.

For David Jones, Plaintiffs allege that he holds the official title of Director of Human Relations for Free Speech Systems and incorrectly claim “[o]n information or belief,” that he “is the owner of Defendants Infowars and Free Speech Systems, and he manages

⁷ It is important to note that in this allegation, no defendant is alleged to have said anything – Mr. Jones is merely alleged to be on camera at the same time that Roger Stone said these things.

⁸ Plaintiffs include significant unrelated matter, turning their Complaint into a “free for all”. See *USA v. Stone*, Case No. 1:19-cr-00018 (D.D.C. Feb. 28, 2019) (striking filing from Mr. Klayman on behalf of Dr. Corsi and admonishing them upon the filing of improper matter).

the business activities for [those companies] as well as Alex Jones' other companies."⁹ Complaint at ¶ 9. They also allege that "he worked in concert with the other Defendants and Roger Stone" but they do not allege, nor can they, that he made any false or defamatory statements about Plaintiffs. *Id.*

2.0 Legal Standard

2.1 No Personal Jurisdiction - Fed. R. Civ. P. 12(b)(2)

Plaintiffs "bear the burden of establishing a basis for exercising personal jurisdiction." *Cockrum v. Donald J. Trump for President, Inc.*, 319 F. Supp. 3d 158, 172 (D.D.C. 2018) (Huvelle, J.) citing *Crane v. New York Zoological Soc.*, 894 F.2d 454, 456 (D.C. Cir. 1990). As further set forth by the Court in *Cockrum*:

the Court "need not accept inferences drawn by plaintiffs if such inferences are unsupported by the facts." *Livnat v. Palestinian Auth.*, 851 F.3d 45, 57 (D.C. Cir. 2017) (citation omitted); see also *Houlahan v. Brown*, 979 F. Supp. 2d 86, 88 (D.D.C. 2013). "Mere conclusions or 'bare allegation[s]' do not constitute the prima facie case for jurisdiction that this standard requires." *Fawzi v. Al Jazeera Media Network*, 273 F. Supp. 3d 182, 186 (D.D.C. 2017) (alteration in original) (citation omitted). "Under District of Columbia law, personal jurisdiction is determined as of the commencement of an action." *Roz Trading Ltd v. Zeromax Grp., Inc.*, 517 F. Supp. 2d 377, 384 (D.D.C. 2007).

319 F. Supp. 3d at 172. Plaintiffs make no allegations, let alone bare ones, to support personal jurisdiction in the District of Columbia.

2.2 Improper Venue - Fed. R. Civ. P. 12(b)(3)

The District of Columbia is an improper venue. Once more, in *Cockrum*, the Court observed:

The "question—whether venue is 'wrong' or 'improper'—is generally governed by 28 U.S.C. § 1391." *Atl. Marine Const. Co. v. U.S. Dist. Court for W. Dist. of Texas*, 571 U.S. 49, 134 S. Ct. 568, 577, 187 L. Ed. 2d 487 (2013) (citation omitted). ... However, a plaintiff has the burden of demonstrating

⁹ David Jones is not actually an owner of these companies, but this is not material to the analysis.

that venue is proper once challenged and "[t]he Court . . . need not accept the plaintiff's legal conclusions as true." *Fam v. Bank of Am. NA (USA)*, 236 F. Supp. 3d 397, 406 [(D.D.C. 2017)]; *Delta Sigma Theta Sorority Inc. v. Bivins*, 20 F. Supp. 3d 207, 212 (D.D.C. 2014).

319 F. Supp. 3d at 173. None of the alleged events, let alone a substantial part, occurred in the District of Columbia; the action can properly be brought in the Western District of Texas.

2.3 Failure to State a Claim

To survive a Rule 12(b)(6) motion to dismiss, "a complaint must contain sufficient factual matter, accepted as true, to 'state a claim to relief that is plausible on its face.'" *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). A facially plausible claim requires "factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." *Iqbal*, 556 U.S. at 678. "While a complaint attacked by a Rule 12(b)(6) motion to dismiss does not need detailed factual allegations . . . a plaintiff's obligation to provide the 'grounds' of his 'entitle[ment] to relief' requires more than labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do." *Twombly*, 550 U.S. at 555.

3.0 Analysis

3.1 This Court Lacks Personal Jurisdiction Over Defendants

To subject a defendant to the jurisdiction of the Court, both Constitutional due process and the D.C. Long Arm statute must be satisfied.¹⁰ See *Cockrum*, *supra* at 173,

¹⁰ The D.C. long-arm statute, D.C. Code Ann. § 13-423, is "coextensive with the due process clause." *Copeland-Jackson v. Oslin*, 555 F. Supp. 2d 213, 216 (D.D.C. 2008) (Huvelle, J.) quoting *Helmer v. Doletskaya*, 393 F.3d 201, 205 (D.C. Cir. 2004). Thus, the "statutory and constitutional jurisdictional questions, which are usually distinct, merge into a single inquiry here." *Id.* quoting *United States v. Ferrara*, 54 F.3d 825, 828 (D.C. Cir. 1995).

1 citing *GTE New Media Servs. Inc. v. BellSouth Corp.*, 199 F.3d 1343, 1347 (D.C. Cir. 2000)
2 and *Edmond v. U.S. Postal Serv. Gen. Counsel*, 949 F.2d 415, 424 (D.C. Cir. 1991). "To
3 show that the exercise of jurisdiction would comply with the constitutional requirements
4 of due process, a plaintiff must demonstrate that there are 'minimum contacts between
5 the defendant and the forum establishing that the maintenance of the suit does not
6 offend traditional notions of fair play and substantial justice.'" *Swecker v. Midland Power*
7 *Coop.*, 253 F. Supp. 3d 274, 278 (D.D.C. 2017) (citation omitted). The Court may
8 "exercise either general or specific personal jurisdiction." *Bigelow v. Garrett*, 299 F. Supp.
9 3d 34, 41 (D.D.C. 2018). Neither is present here.

10 **3.1.1 Defendants Are Not Subject to General Jurisdiction**

11 The individual defendants are not subject to general jurisdiction in the District of
12 Columbia. "For an individual, the paradigm forum for the exercise of general jurisdiction
13 is the individual's domicile." *Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S.
14 915, 924 (2011). Plaintiffs correctly plead that Alex Jones, David Jones, and Owen
15 Shroyer are all Texas citizens. Similarly, Infowars and Free Speech system are
16 incorporated in and have their principal places of business in Texas. "A corporation with
17 a state of incorporation and principal place of business outside of the District cannot be
18 regarded as 'at home' in the District simply because ... it conducts business activity in
19 the District." *Cockrum, supra* at 174, citing *Duarte v. Nolan*, 190 F. Supp. 3d 8, 15 (D.D.C.
20 2016). Thus, no defendant is subject to general jurisdiction in the District of Columbia.

21 _____
22 Looking solely at the statute, however, even that is not met. "Publishing
23 defamatory statements within the District that were made outside the District does not
24 meet the terms of" D.C. Code § 13-423(a)(4). *Hourani v. Psybersolutions LLC*, 164
25 F.Supp.3d 128, 138 (D.D.C. 2016). Nor are there any allegations that Plaintiffs – who are
26 New Jersey and Florida citizens – suffered "tortious injury in the District of Columbia" as
27 required under D.C. Code § 13-423(a)(4). No other portion of the long-arm statute
applies.

3.1.2 Defendants Are Not Subject to Specific Jurisdiction

"For this Court to exercise specific personal jurisdiction over defendants their 'suit-related conduct must create a substantial connection with' the District." *Cockrum, supra*, at 175 quoting *Walden v. Fiore*, 571 U.S. 277, 134 S. Ct. 1115, 1121, 188 L. Ed. 2d 12 (2014). "[C]ourts must insure that 'the defendant's conduct and connection with the forum State are such that he should reasonably anticipate being hauled into court there.'" *GTE*, 199 F.3d at 1347, quoting *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980). "A plaintiff must show a more exacting nexus between a defendant's contacts and the plaintiff's claims to support a finding of specific jurisdiction." *Cockrum, supra*, at 177. Plaintiffs do not plead a single suit-related contact by Defendants giving rise to specific jurisdiction.

Mentions of Defendants' contacts with the District of Columbia are only alleged as incidental to their world-wide broadcast.¹¹ Defendants' content is "posted and broadcast into this district, nationally and internationally." Complaint at ¶ 11. Defendants Alex Jones and Shroyer host shows broadcast "throughout the United States of America and internationally, including this judicial district, and online." *Id.* at ¶¶ 12-13. Defendants and Stone allegedly "do substantial business and promote and sell various goods in this juridical district and nation-wide." *Id.* at ¶ 15; and see *id.* at ¶ 16. Non-party Stone allegedly "began a public relations campaign in this district, nationally

¹¹ Plaintiffs' sole connection to the District of Columbia appears to be that Plaintiff Corsi allegedly publishes unrelated works in the district. Complaint at ¶ 4. However, assuming *arguendo* Plaintiffs suffered some cognizable injury in the District, "these injuries cannot serve as an independent basis for exercising personal jurisdiction over an out-of-state defendant that does not have sufficient in-forum contacts, as the Supreme Court has held, 'the plaintiff cannot be the only link between the defendant and the forum. Rather, it is the defendant's conduct that must form the necessary connection with the forum State that is the basis for its jurisdiction over him.'" *Cockrum, supra* at 183, quoting *Walden*, 134 S. Ct. at 1122.

and internationally" to defame Plaintiffs. *Id.* at ¶ 26. Stone's January 18, 2019 statements were allegedly made "in this district, nationally and internationally". *Id.* at ¶ 48. Defendants allegedly compete with Plaintiffs "in media markets in this district, nationally and internationally." *Id.* at ¶ 64. Defendants allegedly published defamatory statements "in this judicial district, nationwide, and worldwide." *Id.* at ¶ 77; see also *id.* at ¶ 83 ("statements were published in this district and on the internet and elsewhere, domestically and for the entire world to see and hear"); *id.* at ¶ 89 ("statements were published on the internet and published and republished elsewhere in this district, domestically and for the entire world to see and hear."); and *id.* at ¶ 109 (alleged statements "were widely broadcast on radio, on the internet, in social media, and elsewhere in this district, nationally and internationally.").

The mere fact that Defendants' broadcasts reach the District of Columbia, as but a part of the nation and the world, is insufficient forum-related contacts.¹² Compare *Hourani v. PsyberSolutions LLC*, 164 F. Supp. 3d 128, 139 (D.D.C. 2016) (discussing precedent where "[e]ven though the information on the website could be viewed by Internet users everywhere, this fact did not create nationwide personal jurisdiction. The

¹² To the extent Plaintiffs seek to assert Defendants Alex Jones, David Jones, and Owen Shroyer are subject to personal jurisdiction in the District of Columbia should the Court determine that one of the corporate entities is, such does not automatically follow. "Under the fiduciary shield doctrine, personal jurisdiction over a corporate officer may not be asserted based on 'contacts with the forum [that] are exclusively in relation to the defendant's corporate responsibility.'" *Mouzon v. Radiance, Inc.*, 85 F. Supp. 3d 361, 371 (D.D.C. 2015) quoting *Nat'l Cmty. Reinvestment Coal v. NovaStar Fin., Inc.*, 631 F. Supp. 2d 1, 5 (D.D.C. 2009). Rather, "[p]ersonal jurisdiction over officers of a corporation in their individual capacities must be based on their personal contacts with the forum, not their acts and contacts carried out solely in a corporate capacity." *Overseas Partners, Inc., v. PROGEN Musavirlik ve Yonetim Hizmetleri, Ltd. Sikerti*, 15 F.Supp.2d 47, 51 (D.D.C. 1998). Plaintiffs do not allege any such personal contacts of those defendants in their personal capacities with the District of Columbia.

critical fact for the determination of personal jurisdiction was where the tortious injury occurred"). In *Copeland-Jackson, supra*, the Court considered a defamation claim in which the D.C.-resident plaintiff was referred-to as a pedophile in an online publication, stating:

The D.C. Circuit has made clear that the mere act of 'writing an article for a publication that is circulated throughout the nation, including the District, hardly constitutes doing or soliciting business, or engaging in a persistent course of conduct within the District.' *McFarlane v. Esquire Magazine*, 74 F.3d 1296, 1300 (D.C. Cir. 1996) (emphasis in original). ... Furthermore, the D.C. Circuit has also explained that 'personal jurisdiction . . . cannot be based solely on the ability of District residents to access the defendants' websites, for this does not by itself show any persistent course of conduct by the defendants in the District.' *GTE New Media Services Inc. v. Bellsouth Corp.*, 199 F.3d 1343, 1349-50 (D.C. Cir. 2000). See also *Young v. New Haven Advocate*, 315 F.3d 256, 262-63 (4th Cir. 2002) ('[A]pplication of *Calder* in the Internet context requires proof that the out-of-state defendant's Internet activity is expressly targeted or directed to the forum state.') Plaintiff has therefore failed to make any showing that defendants purposefully availed themselves of the privilege of doing business in the District, such that the exercise of jurisdiction over them would not offend due process. Plaintiff's complaint must therefore be dismissed under Fed. R. Civ. P. 12(b)(2).

555 F. Supp. 2d at 216-17. Personal jurisdiction is absent where a plaintiff cannot show "that the defendants purposefully availed themselves of the District of Columbia any more than they availed themselves of every other jurisdiction in which their website was accessible." *Hayes v. FM Broadcast Station WETT (FM)*, 930 F. Supp. 2d 145, 151-52 (D.D.C. 2013). Similarly, Defendants' and Mr. Stone's online broadcasts do not solicit business or engage in conduct in the District of Columbia and it is not expressly targeted or directed to it. That it may relate to the Special Counsel's investigation is no more targeted or directed to D.C. than the *Ashland Times Gazette's* article about Mr. Copeland-Jackson.

Neither does the Complaint satisfy the *Calder* effects test. “[T]here is nothing as yet to indicate that the defendants engaged in unabashedly malignant actions directed at or felt in this forum.” *GTE New Media Servs. v. BellSouth Corp.*, 199 F.3d 1343, 1349 (2000) citing *Panavision Int’l, Ltd. P’ship v. Toeppen*, 141 F.3d 1316, 1321 (9th Cir. 1998) (itself citing *Calder v. Jones*, 465 U.S. 783 (1984)). Under the doctrine, “personal jurisdiction may rest upon ‘(1) intentional actions (2) expressly aimed at the forum state (3) causing harm, the brunt of which is suffered -- and which the defendant knows is likely to be suffered -- in the forum state.’” *Kline v. Williams*, 2006 U.S. Dist. LEXIS 23263, *17, 2006 WL 758459 (D.D.C. 2006) quoting *Panavision, supra* at 1318. Plaintiffs cannot meet these elements. The statements were no more aimed at the District of Columbia than to any other state and Plaintiffs’ alleged harm was not suffered, and would not have been known to be suffered, in the District of Columbia. D.C. is not the “focal point” of the statements. *Kline, supra* at * 19 n. 9. None of the statements refer to D.C. or the Special Counsel’s investigation.¹³ Even if they did, “[t]here is also no support for the proposition that merely speaking about a forum (or about entities within that forum)—e.g., producing a film about or seeking employment with the federal government, discussing one’s relationships with federal government officials—can confer specific jurisdiction in the absence of identifiable forum contacts.” *Bauman v. Butowsky*, 2019 U.S. Dist. LEXIS 54507, *10 (D.D.C. Mar. 28, 2019). None of the allegations relate to Plaintiffs’ ability to access the D.C. media market or sell books there. Thus, the matter should be dismissed for lack of personal jurisdiction.

¹³ This is not to say that even discussing the Special Counsel’s investigation or the prosecution of Roger Stone, or Corsi’s status as a witness, makes D.C. a focal point. In fact, “[c]ourts have also generally held that a defendant’s contacts with the United States government do not factor into the personal jurisdiction analysis.” *Lewy v. Southern Poverty Law Ctr., Inc.*, 723 F.Supp.2d 116, 125 (D.D.C. 2010).

3.2 The District of Columbia is an Improper Venue

Plaintiffs assert that venue lies in this judicial district pursuant to 28 U.S.C. §§ 1391(b)(2) & (3), claiming that “a substantial part of the events or omissions giving rise to Plaintiffs’ claims arose in this district.” Complaint at ¶ 3. Specifically, they claim that the statements are intended to influence the Special Counsel’s investigation and prosecution of Roger Stone in the district, and that the other alleged statements at issue “occurred herein”, presumably meaning in the District of Columbia. *Id.* Venue is not proper in this district.

Under section 1391(b)(2), “[a] civil action may be brought in . . . a judicial district in which a *substantial* part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated.” 28 U.S.C. § 1391(b)(2) (emphasis added). Again, this Court’s decision in *Cockrum* controls, where it observed:

“[W]here ‘the claim arose’ should . . . be ascertained by advertence to events having operative significance in the case, and a commonsense appraisal of the implications of those events for accessibility to witnesses and records.” *Lamont v. Haig*, 590 F.2d 1124, 1134 (D.C. Cir. 1978). Peripheral and tangential events occurring in the district will not establish venue. See *Ciralsky v. CIA*, 689 F. Supp. 2d 141, 161 (D.D.C. 2010). “[P]laintiffs must show that a considerable portion of the events took place in their chosen forum.” *Perlmutter v. Varone*, 59 F. Supp. 3d 107, 110 (D.D.C. 2014).

319 F. Supp. 3d at 190. The events having operative significance occurred in Texas—all the statements were allegedly made on programs originating from there. No portion, let alone a considerable one, took place in D.C. The Special Counsel’s investigation is peripheral and tangential. Reliance on “on vague allegations of conspiratorial activity possibly occurring in the District” is insufficient. *Cockrum*, *supra* at 190.

Under section 1391(b)(3), "if there is no district in which an action may otherwise be brought as provided in this section," then the case may be brought in "any judicial district in which any defendant is subject to the court's personal jurisdiction." 28 U.S.C. § 1391(b)(3). However, Defendants are subject to the general jurisdiction of the courts in Texas, including the Western District of Texas, where Austin is situated and Defendants are resident. Compare *Amr v. Virginia*, 58 F. Supp. 3d 27, 31-32 (D.D.C. 2014) (dismissing action where case could be brought in the Eastern District of Virginia).

Defendants recognize that, "[u]pon a showing that venue in this district is improper, a court 'shall dismiss, or if it be in the interest of justice, transfer such case to any district or division in which it could have been brought.'" *Amr, supra*, at 32 quoting 28 U.S.C. § 1406. Although transfer is favored when a plaintiff is *pro se*, Mr. Klayman is an experienced attorney and is also representing Dr. Corsi in this matter. See *James v. Verizon Servs. Corp.*, 639 F. Supp. 2d 9, 15 (D.D.C. 2009) Thus, his *pro se* status should hold no weight. Further, another "consideration is whether transfer would prejudice Defendant's position on the merits." *Id.* (citing *Sinclair v. Kleindienst*, 711 F.2d 291, 293-94 (D.C. Cir. 1983)) (internal quotation marks and citation omitted). Here, Defendants would be prejudiced by a transfer as they will have not been able to move for dismissal on the merits in conjunction with a motion under the Texas Citizens Participation Act. Unlike the analogous D.C. anti-SLAPP statute, "[t]he Fifth Circuit has not decided whether the TCPA applies in federal court when a court exercises its diversity or supplemental jurisdiction over state-law claims." *N.P.U., Inc. v. Wilson Audio Specialties, Inc.*, 343 F. Supp. 3d 661, 665 (W.D. Tex. 2018). Plaintiffs' claims are outrageous, seeking \$50,000,000 each here,¹⁴ filed without any risk that the common law claims would be subject to fee shifting. Plaintiffs are fully capable of litigating in Texas and deciding for

¹⁴ They claim similar damages in a separate case against Mr. Stone, but it is only for a mere \$25,000,000.

themselves whether they truly believe their claims have merit to warrant refiling there. Thus, dismissal, rather than transfer, is proper.

3.3 Plaintiffs have No Actionable Defamation Claim

Plaintiffs first three causes of action sound in defamation. To state a defamation claim under D.C. tort law, a plaintiff must adequately plead: "(1) that he was the subject of a false and defamatory statement; (2) that the statement was published to a third party; (3) that publishing the statement was at least negligent; and (4) that the plaintiff suffered either actual or legal harm." *Farah v. Esquire Mag.*, 736 F.3d 528, 533-34 (D.C. Cir. 2013). Plaintiffs cannot meet these elements.

3.3.1 As a Matter of Law, Plaintiffs Cannot Prove the Statements Are False or Defamatory

The statements at issue are generally neither false nor defamatory, whether viewed directly or by implication.¹⁵ "Actionable statements must be *both* false and defamatory" *Deripaska v. AP*, 282 F. Supp. 3d 133, 141 (D.D.C. 2017) (Huvelle, J.)(emphasis in original). The Court must consider whether the allegations "(1) contains [] express or implied verifiably false statements of fact, which (2) are reasonably capable of defamatory meaning or otherwise place [Plaintiffs] in an offensive false light." *Weyrich v. New Republic, Inc.*, 235 F.3d 617, 623 (D.C. Cir. 2001). More specifically, in *Copeland-Jackson*, this Court observed:

To make out a claim for defamation, plaintiff must demonstrate by a preponderance of the evidence that the statements made about him were false. *Klayman v. Segal*, 783 A.2d 607, 613 (D.C. 2001) (citing *Moldea v. New York Times Co.*, 15 F.3d 1137, 1142 (D.C. Cir. 1994)). The truth of the

¹⁵ "A defamation by implication...is not treated any differently than a direct defamation once the publication has been found capable of a defamatory meaning. A defendant may escape liability if the defamatory meaning is established as true or as constitutionally protected expression." *White v. Fraternal Order of Police*, 909 F.2d 512, 523 (D.C. Cir. 1990).

publication is a complete defense in a libel action. *Lohrenz v. Donnelly*, 223 F. Supp. 2d 25, 59 (D.D.C. 2002). If a publication is substantially true, then it is "true" as a legal matter for defamation purposes. See *Benic v. Reuters America, Inc.*, 357 F. Supp. 2d 216, 221 (D.D.C. 2004).

Copeland-Jackson v. Oslin, 555 F. Supp. 2d 213, 217 (D.D.C. 2008). "Where the question of truth or falsity is a close one, a court should err on the side of nonactionability." *Liberty Lobby, Inc. v. Dow Jones & Co.*, 838 F.2d 1287, 1292 (D.C. Cir. 1988).

Further, "'imaginative expression' and 'rhetorical hyperbole' are not actionable in defamation because 'they cannot reasonably be interpreted as stating actual facts about an individual.'" *Ford Transp. Indus., Inc. v. Wilner*, 760 A.2d 580, 596-7 (D.C. 2000) (quoting *Milkovich v. Lorain Journal Co.*, 491 U.S. 1, 2 (1990)). Additionally, "although a statement of opinion can be actionable where it implies 'a provably false fact, or rel[ies] upon stated facts that are provably false,' 'if it is plain that a speaker is expressing a subjective view, an interpretation, a theory, conjecture, or surmise, rather than claiming to be in possession of objectively verifiable facts, the statement is not actionable.'" *Deripaska v. AP*, 282 F. Supp. 3d 133, 141 (D.D.C. 2017) quoting *Guilford Transp. Indus. v. Wilner*, 760 A.2d 580, 597 (D.C. 2000) (internal citation omitted). The determination of "[w]hether a statement 'asserts actionable facts or implies such facts is a question of law for the court to determine as a threshold matter.'" *Montgomery v. Risen*, 197 F.Supp.3d 219, 247-48 (D.D.C. 2016) (quoting *Moldea v. N.Y. Times Co.*, 15 F.3d 1137, 1144 (D.C. Cir. 1994). Just as Mr. Klayman could not meet his burden in *Klayman v. Segal*, he and his client cannot do so here.

At the outset, it must be noted that there are no allegations that Defendants David Jones, Owen Shroyer, Infowars, or Free Speech Systems themselves made any false statements at all.¹⁶ All of the statements at issue were either made by Defendant

¹⁶ As discussed below, Plaintiffs cannot show any fault, let alone actual malice, in Defendants broadcasting statements made by others.

Alex Jones or non-party Roger Stone. Accordingly, all other defendants should be dismissed without further analysis being necessary.

As to the statements by Alex Jones in the October 26, 2018, video,¹⁷ these are all substantially true, non-defamatory, and/or statements, in their context, of opinion or rhetorical hyperbole.

1) "when I was in DC about six months ago with dr. [sic] Corsi he seemed to mentally be extremely degraded to the point of what I would call dementia." See Complaint at ¶ 43 and **Exhibit 1**. Although Plaintiffs refer to this statement as "false", they do not assert a particular falsehood. They do not assert it is factually false that Mr. Jones observed Dr. Corsi at that time and place. The remainder is Mr. Jones's opinion based on his observation, i.e., what it "**seemed**". Accord *Q Intern. Courier, Inc. v. Seagraves*, 1999 U.S. Dist. LEXIS 23355 at *6 (D.D.C. Feb. 26, 1999) ("the inclusion of cautionary language" favors "treating the statement that follows as an expression of opinion."); *Bauman v. Butowsky, supra* at *20 ("seemed" is "subjective" and "unverifiable").

2) "[Corsi]'s on the ground at another table we had to help him out of there man they thought he was dead in the elevator". See Complaint at ¶ 44 and **Exhibit 1**. Whether or not third parties thought Dr. Corsi was dead, which he discloses was based on them "listening to his chest", is merely a report of their opinions. Neither is there any defamatory meaning in a statement about whether Dr. Corsi may have passed out.

¹⁷ Plaintiffs' claims arise from the video at the URL cited at footnote 9 of their Complaint. A copy of the closed captions embedded in that video at that URL appears at **Exhibit 1**. In deciding a motion to dismiss "a court is not limited to the facts alleged in the complaint, but also may consider documents attached to or incorporated by reference in the complaint, matters about which the court may take judicial notice, and any documents appended to a motion to dismiss whose authenticity is not disputed if they are referred to in the complaint and are integral to a claim." *GenopsGroup LLC v. Pub. House Invs. LLC*, 67 F. Supp. 3d 338, 341 (D.D.C. 2014) (Huvelle, J.) citing *U.S. ex rel. Folliard v. CDW Tech. Servs., Inc.*, 722 F. Supp. 2d 20, 24 (D.D.C. 2010) and Fed. R. Civ. P. 10(c).

3) “[Corsi] had a stroke or whatever’s going on with Corsi that whatever comes out of his mouth ain’t the truth”. See Complaint at ¶ 45 and **Exhibit 1**. Although, in isolation, these might sound like false statements of fact, in context Mr. Jones had earlier said “*I think he’s got dementia or a stroke I mean I don’t know*”, describing him as having had “*a really sharp brain until about a year ago*”, and then relaying his grandfather’s mental demise following a heart attack. See **Exhibit 1**. Thus, Mr. Jones did not call Dr. Corsi an intentional liar, but rather one who he believes Corsi said things in error based on his observations of Corsi’s health conditions. When “the bases for the . . . conclusion are fully disclosed, no reasonable reader would consider the term anything but the opinion of the author drawn from the circumstances related.” *Chapin v. Knight-Ridder, Inc.*, 993 F.2d 1087, 1093 (4th Cir. 1993). Moreover, “just stating that someone is ‘spreading lies’ or is a liar may not be actionable as defamation.” *Sinclair v. TubeSockTedD*, 596 F.Supp.2d 128, 133 (D.D.C. 2009). “Context is crucial,” as it “can turn what, out of context, appears to be a statement of fact into ‘rhetorical hyperbole,’ which is not actionable.” *Ollman v. Evans*, 750 F.2d 970, 1000 (D.C. Cir. 1984) (Bork, J., concurring). Thus, in “[t]he medium of talk radio,” “hyperbole and diatribe” are “preferred tools of discourse” and speech is “not infrequently caustic and offensive”. *Bauman supra* at * 24, quoting *CACI Premier Tech., Inc. v. Rhodes*, 536 F.3d 280, 304 (4th Cir. 2008) (Duncan, J., concurring). The reasonable listener would view an accusation of lying as just an “expression of outrage”. *Schnare v. Ziessow*, 104 F. App’x 847, 852 (4th Cir. 2004) citing *Horsley v. Rivera*, 292 F.3d 695, 701-02 (11th Cir. 2002).

Similarly, in the January 21, 2019, video,¹⁸ Mr. Jones is accused of calling Plaintiff Corsi a “spook, back and forth with different agencies.” Complaint at ¶ 68. There is

¹⁸ Plaintiffs’ claims arise from the video at the URL cited in footnote 13 of their Complaint. A copy of the first 53 minutes of the closed captions embedded in that video at that URL appears at **Exhibit 2**.

nothing defamatory about working with the intelligence community. On the contrary – most reasonable people would find such facts to be flattering.

Moreover, in context, Mr. Jones was reporting on what FBI agents and others had relayed to him. See **Exhibit 2**. Further, Mr. Jones did not accuse Corsi of “not being able to walk”; what he actually said was that Corsi is “*super smart unless you catch him when he can’t walk*”. Compare Complaint at ¶ 69 with **Exhibit 2**. Expressing an opinion as to when someone might not seem terribly smart is not actionable defamation.

The remaining allegations stem from statements by non-party Roger Stone that Dr. Corsi is not telling the truth and that Mr. Klayman is an incompetent attorney. However, Dr. Corsi has recently admitted “My recollections and Roger’s differ on this. Now, I’m not maintaining that my recollection is true and his is false. ... My recollections are not always accurate against an objective sense of truth[.]”¹⁹ Thus, the statements as to him are substantially true.

The statements as to Mr. Klayman are primarily statements of opinion and rhetorical hyperbole as to his competence. They are otherwise true or substantially true. Klayman’s arguments have been deemed “patently inadequate”. *Klayman v. Judicial Watch, Inc.*, 802 F. Supp. 2d 137, 148 (D.D.C. 2011). It was also observed that “[d]espite having more than ample opportunity to do so, Klayman has utterly failed to discharge his obligations in the course of pretrial proceedings.” *Id.* at 149. As to the separation from Judicial Watch in paragraph 57 of the Complaint, such was relaying information of which this Court is aware:

Judicial Watch alleges that in May 2003, Klayman informed Fitton and Orfanedes that his wife, a former Judicial Watch employee, had commenced divorce proceedings against him and that she alleged that Klayman had had an inappropriate relationship with a Judicial Watch

¹⁹ See <https://play.acast.com/s/skullduggery/coulterandcorsithedeplorablesedition>

employee with whom he had been in love and that Klayman had assaulted her physically. According to Judicial Watch, Klayman denied having a sexual relationship with the employee but acknowledged that he had been in love with the employee, that he had purchased gifts for the employee and had kissed her, and also acknowledged an incident with his wife that clearly provided the basis for his wife's allegation of physical assault. Judicial Watch alleges that Fitton and Orfanedes considered Klayman's acknowledged behavior entirely inconsistent with that of a leader of a conservative, pro-family organization, as well as Klayman's fiduciary duties to the organization, and that they were concerned about Klayman's possible misuse of Judicial Watch resources. Judicial Watch further alleges that, as a result of these revelations, Fitton requested that Klayman resign, and Fitton and Orfanedes also insisted that Judicial Watch undertake an internal investigation into Klayman's conduct, including an audit. According to Judicial Watch, Klayman offered to resign rather than face such an inquiry, and the parties began negotiating for his separation from Judicial Watch, which eventually culminated in the September 19, 2003 Severance Agreement.

Klayman v. Judicial Watch, Inc., 247 F.R.D. 10, 12-13 (D.D.C. 2007) (internal citations and quotation marks omitted). Judicial Watch and Fitton had counterclaimed, inter alia, that Mr. Klayman made false and disparaging statements when he said his separation related to Fitton "set[ting] out to hijack the group to further his own personal interests." See Amended Counterclaim, *Klayman v. Judicial Watch, Inc.*, Case No. 1:06-cv-00670 (Dec. 3, 2007) (Dkt. No. 86 ¶ 35). Final judgment on the disparagement claim in favor of Judicial Watch and Fitton entered on March 18, 2019, and Mr. Klayman is estopped from relitigating the allegations. See *Klayman v. Judicial Watch, Inc.*, Case No. 1:06-cv-00670 (Mar. 18, 2019) (Dkt. No. 584). Thus, as a matter of law, Mr. Stone's statement is true or substantially true.

3.3.2 Plaintiffs are Public Figures and the Statements were not Published with Actual Malice

Plaintiffs are public figures. "There are two types of public figures: (1) general public figures who maintain such status for all purposes and (2) limited-purpose public figures ""(who) voluntarily inject[] [themselves] or [are] drawn into a particular public controversy and therefore become[] . . . public figure[s] for a limited range of issues." *Jankovic v. Int'l Crisis Grp.*, 72 F. Supp. 3d 284, 300 (D.D.C. 2014) quoting *Waldbaum v. Fairchild Publ'ns, Inc.*, 627 F.2d 1287, 1292 (D.C. Cir. 1980) (quoting *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 351 (1974)).

Dr. Corsi and Mr. Klayman are both general public figures or, at a minimum, limited purpose public figures. As to Mr. Klayman, this has been found previously as a matter of law, which he has also conceded, and it need not be relitigated. See *Klayman v. Judicial Watch, Inc.*, 22 F. Supp. 3d 1240, 1251 (S.D. Fla. 2014) ("Because of Klayman's notoriety and high-profile work in the public realm, the Court considers Klayman a public figure.") and *Klayman v. City Pages*, 2015 U.S. Dist. LEXIS 49134, at *39 (M.D. Fla. Apr. 3, 2015) ("Plaintiff has conceded that he is a public figure.") Similarly, "Jerome Corsi is a 'world-renowned author of several New York Times bestsellers[.]'" *Farah v. Esquire Magazine*, 736 F.3d 528, 531 (D.C. Cir. 2013) (quoting Corsi's own claims). Dr. Corsi has otherwise voluntarily injected himself into the high-profile prosecution of Roger Stone.²⁰

²⁰ To determine whether an individual is a limited-purpose public figure: First, the Court must determine whether a public controversy existed. This assessment requires the Court to determine whether there was a dispute that in fact had received public attention because its ramifications would be felt by persons who were not direct participants. Second, the Court must analyze the plaintiff's role in the controversy. Trivial or tangential participation is not enough...to be considered a limited-purpose public figure, a plaintiff must have achieved special prominence in the debate. To satisfy the special prominence requirement, the plaintiff either must have

See, e.g., *United States v. Stone*, 2019 U.S. Dist. LEXIS 28860, *2 (D.D.C. Feb. 15, 2019). Thus, the public figure standard applied.

A public figure defamation plaintiff is "required to plausibly allege that the [defendant] 'published the defamatory falsehood with 'actual malice,' that is, with 'knowledge that it was false or with reckless disregard of whether it was false or not.'"
Deripaska v. AP, 282 F. Supp. 3d 133, 143 (D.D.C. 2017) (Huvelle, J.) quoting *Liberty Lobby, Inc. v. Dow Jones & Co.*, 838 F.2d 1287, 1292 (1988) (itself quoting *New York Times v. Sullivan*, 376 U.S. 254, 280 (1964)). Notably,

"[t]he standard of actual malice is a daunting one." *McFarlane v. Esquire Magazine*, 74 F.3d 1296, 1308 (D.C. Cir. 1996). To establish actual malice, plaintiffs must show that defendant either knew that the challenged publication was false, or that he "in fact entertained serious doubts as to the truth of his publication." *St. Amant v. Thompson*, 390 U.S. 727, 731 (1968). Subjective ill-will does not establish actual malice, nor does a malevolent motive for publication. *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 665 (1989). Even "highly unreasonable conduct constituting an extreme departure from the standards of investigation and reporting ordinarily adhered to by responsible publishers" does not establish actual malice. *Id.* at 666. But a plaintiff can show actual malice if he can demonstrate by clear and convincing evidence that defendant was "subjectively aware that it was highly probable that the story was (1) fabricated; (2) so inherently improbable that only a reckless person would have put it in circulation; or (3) based wholly on an unverified anonymous telephone call or some other source that appellees had obvious reasons to

been purposely trying to influence the outcome or could realistically have been expected, because of his position in the controversy, to have an impact on its resolution. Finally, the Court must assess whether the alleged defamation was germane to the plaintiff's participation in the controversy. *Jankovic v. Int'l Crisis Group*, 72 F.Supp.3d 284, 301 (D.D.C. 2014) [internal citations omitted]. The Special Counsel's investigation and prosecution of Mr. Stone is a public controversy. Dr. Corsi's role is non-trivial. And, the record shows that he is trying to have an impact on the outcome of it. The statements at issue were directly germane to Dr. Corsi's role in the controversy.

doubt." *Lohrenz v. Donnelly*, 350 F.3d 1272, 1283 (D.C. Cir. 2003) (citations omitted).

Parsi v. Daioleslam, 890 F. Supp. 2d 77, 81 (D.D.C. 2012). Plaintiffs cannot meet this burden.

First, as to Defendants Owen Shroyer and David Jones, there are no allegations that they themselves published any statements, let alone with actual malice. Similarly, Infowars and Free Speech Systems have not acted with actual malice. Although Plaintiffs allege that the defendants conspired together, actual malice must be proven separately as to each defendant. See *St. Amant*, 390 U.S. at 730. Having Mr. Stone appear on their programs offers no basis to suggest they believed Mr. Stone's statements would be fabricated, inherently improbably, or that they had obvious reasons to be doubted.

Second, as to Alex Jones, as with the other defendants, there are no plausible allegations that he acted with actual malice in merely having Mr. Stone on the programs, rendering him responsible for any of those statements. As to his own statements, they were based on his perceptions of Dr. Corsi and what others reported to him. There is no basis to suggest he acted in reckless disregard of the truth, especially where Dr. Corsi himself admits that his memory could be faulty. Thus, the defamation claims must be dismissed.

3.4 Defendants Are Not Liable, As a Matter of Law, for Intentional Infliction of Emotional Distress

As they cannot recover for defamation, Plaintiffs cannot recover for intentional infliction of emotional distress. Plaintiffs are aware that they "may not use related causes of action to avoid the constitutional requisites of a defamation claim." *Moldea v. N.Y. Times Co.*, 22 F.3d 310, 319-20 (1994) (citing *Cohen v. Cowles Media Co.*, 501 U.S. 663, 671(1991)). Such was fatal to Dr. Corsi's claims, brought by Mr. Klayman, in *Farah v.*

Esquire Magazine, 736 F.3d 528, 540 (2013). The constitutional limitations equally apply to claims for intentional infliction of emotional distress. See *Barr v. Clinton*, 370 F.3d 1196, 1203 (D.C. Cir. 2004) citing *Hustler Magazine v. Falwell*, 485 U.S. 46 (1988).

Notwithstanding the failure of this claim under the First Amendment, they fail on the merits. To bring a claim for intentional infliction of emotional distress, “a plaintiff must show (1) extreme and outrageous conduct on the part of the defendant which (2) intentionally or recklessly (3) causes the plaintiff [to suffer] severe emotional distress.” *Doe v. Bernabei & Wachtel, PLLC*, 116 A.3d 1262, 1269 (D.C. 2015) (citing *Ortberg v. Goldman Sachs Grp.*, 64 A.3d 158, 163 (D.C. 2013)) (brackets in original). See *id.* “To survive a motion to dismiss,” a plaintiff must allege conduct that was “so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.” *Id.* (citing *Williams v. District of Columbia*, 9 A.3d 484, 494 (D.C. 2010)).

The standard for “extreme and outrageous conduct” is exceptionally demanding. Conduct is considered ‘extreme and outrageous’ when it is so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized society. **[M]ere insults, indignities, threats, annoyances, petty oppressions, or other trivialities are not sufficient.**

Bonner v. S-Fer International, Inc., 207 F.Supp.3d 19, 25 (D.D.C. 2016) (internal citations omitted) (emphasis added). The statements about Corsi and Klayman are mere insults and indignities, at best. The only so-called threat, in paragraph 67, was Mr. Stone saying “I look forward to our confrontation. I will demolish you [Dr. Corsi].” No physicality is threatened; the confrontation referred to is a verbal one and there is no basis to suggest otherwise. Even if someone could possibly interpret “demolish” a threat, “[i]nsults, indignities, [and] threats,’ without more, do not constitute intentional infliction of emotional distress.” *De Sousa v. Embassy of Angl.*, 267 F. Supp. 3d 163, 172 (D.D.C. 2017)

1 quoting *King v. Kidd*, 640 A.2d 656, 668 (D.C. 1993). Neither is the Instagram image noted
2 at paragraphs 95-96 extreme or outrageous conduct. It is not a death threat—it was a
3 rhetorical device. See *id.* at 173 ("Calling the plaintiff names and even threatening the
4 plaintiff may have indeed upset him, but inflicting some worry and concern does not
5 bring the conduct to the level of extreme and outrageous, and these insults, indignities,
6 and threats, even if the meetings did in fact occur as the plaintiff alleges, are simply not
7 sufficient to support the plaintiff's claim." Internal citations and quotation marks
8 omitted).

9 In addition to the absence of extreme or outrageous conduct directed toward
10 Dr. Corsi, with no allegations of any conduct directed to Mr. Klayman, no severe harm
11 was pleaded. In *Wood v. Newman*, plaintiff described that the defendant's actions left
12 her "horrified," "shaken," "embarrassed," "constantly crying," and "almost sleepless,"
13 but these allegations were insufficient. *Wood v. Newman*, 979 A.2d 64, 78 (D.C. 2009).
14 Plaintiffs' allegations here are perfunctory. See Complaint at ¶ 97. Thus, this claim must
15 be dismissed.

16 **3.5 Defendants Did Not Assault Plaintiffs with Insults**

17 Defendants are not liable for assault. "Claims for assault must involve 'an
18 intentional and unlawful attempt or threat, either by words or by acts, to do physical
19 harm to the victim.'" *Dingle v. District of Columbia*, 571 F.Supp.2d 87, 98 (D.D.C. 2008)
20 quoting *Etherege v. District of Columbia*, 635 A.2d 908, 916 (D.C. 1993). "An actor will
21 not be held liable for assault for negligent or reckless behavior lacking the requisite intent
22 to commit an assault." *Forras v. Rauf*, 39 F.Supp.3d 45, 56 (D.D.C. 2014), *aff'd on other*
23 *grounds*, 812 F.3d 1102 (D.C. Cir. 2016), *see also Jackson v. District of Columbia*, 412 A.2d
24 948, 955 n. 15 (D.C. 1980). "Also, 'an essential element of ... assault is ... intentional[ly]"
25
26

1 putting another in apprehension' and absent such an allegation a complaint is 'clearly
2 deficient.' *Id.* (quoting *Madden v. D.C. Transit Sys., Inc.*, 307 A.2d 756, 757 (D.C. 1973).

3 Plaintiffs do not plead an actual threat, let alone intent, on the part of any
4 defendant. There are no credible allegations that Defendants called anyone "to arms"
5 with "deadly violence" as stated in Paragraph 101 of the Complaint. Though it purports
6 to refer to matters "set forth above", none are. Complaint at ¶ 101. Verbally
7 demolishing someone and posting a meme on Instagram are not threats of physical
8 harm. Nor is there any allegation that the defendants here bear any responsibility for
9 Mr. Stone's statements. Plaintiffs do not allege intent and none can be implied.
10 Compare *Zhi Chen v. District of Columbia*, 808 F.Supp.2d. 252, 258-9 (D.D.C.
11 2011)(dismissing assault claim because plaintiff failed "to point to any record evidence
12 indicating that Officer Ha ever attempted or threatened to harm Ms. Chen physically. Ms.
13 Chen's failure to identify such evidence is fatal to her assault claim.") Thus, the assault
14 claim should be dismissed.

15 **3.6 Defendants Are Neither Liable Under the Lanham Act Nor for**
16 **Common Law Unfair Competition**

17 In their final cause of action, Plaintiffs assert claims of common law unfair
18 competition and violation of 15 U.S.C. § 1125(a). As set forth above, Defendants did not
19 make any provably false statements of fact. Moreover, as Plaintiffs should be aware,
20 Section 1125(a) "appl[ies] only to commercial speech." *Farah v. Esquire Magazine*, 736
21 F.3d 528, 541 (D.C. Cir. 2013). "The mere fact that the parties may compete in the
22 marketplace of ideas is not sufficient to invoke the Lanham Act." *Id.* Commercial
23 speech is "expression related solely to the economic interests of the speaker and its
24 audience." *Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm'n of N.Y.*, 447 U.S. 557,
25 561, 100 (1980). The "core notion" of commercial speech is speech that does "no more
26

1 than propose a commercial transaction," *Nat'l Assoc. of Mfrs. v. S.E.C.*, 800 F.3d 518, 523
2 n.12 (D.C. Cir. 2015) (quoting *Bolger v. Youngs Drug Prods. Corp.*, 463 U.S. 60, 66 (1983)).
3 "The Supreme Court has identified three factors in looking beyond the core notion of
4 commercial speech: (1) that the material was "conceded to be advertisements," (2) it
5 contained a "reference to a specific product," and (3) the speaker "has an economic
6 motivation" for distributing the material. No one factor is dispositive." *Tobinick v. Novella*,
7 848 F.3d 935, 950 (11th Cir. 2017) quoting *Bolger*, 463 U.S. at 66-67. These factors do not
8 support a claim that the speech is commercial.

9 First, Defendants do not concede the speech to be advertisements. Second, as
10 in *Tobinick*, the speech does not discuss any products or services for sale. Third, there is
11 no basis to suggest an economic motivation for the speech. Compare *Tobinick*, supra
12 at 952 ("Even if Dr. Novella receives some profit for his quasi-journalistic endeavors as a
13 scientific skeptic, the articles themselves, which never propose a commercial
14 transaction, are not commercial speech simply because extraneous advertisements
15 and links for memberships may generate revenue."); see also *Va. State Bd. of Pharmacy*
16 *v. Va. Citizens Consumer Council, Inc.*, 425 U.S. 748, 761 (1976) ("Speech . . . is protected
17 . . . even though it may involve a solicitation to purchase or otherwise pay or contribute
18 money."); *Burstyn v. Wilson*, 343 U.S. 495, 501 (1952) ("That books, newspapers, and
19 magazines are published and sold for profit does not prevent them from being a form
20 of expression whose liberty is safeguarded by the First Amendment."). Thus, the claim
21 under the Lanham Act must fail.

22 The common-law tort of unfair competition "is not defined in terms of specific
23 elements, but by the description of various acts that would constitute the tort if they
24 resulted in damage." See *Camarda v. Certified Fin. Planner Bd. of Standards, Inc.*, 672 F.
25 App'x 28, 30 (D.C. Cir. 2016) quoting *Furash & Co. v. McClave*, 130 F. Supp. 2d 48, 57
26

(D.D.C. 2001). Torts that could constitute unfair competition include "defamation, disparagement of a competitor's goods or business methods, intimidation of customers or employees, interference with access to the business, threats of groundless suits, commercial bribery, inducing employees to sabotage, false advertising or deceptive packaging likely to mislead customers into believing goods are those of a competitor." *B & W Mgmt., Inc. v. Tasea Inv. Co.*, 451 A.2d 879, 881 n.3 (D.C. 1982). Since Defendants committed none of these acts, the claim for common law unfair competition fails.²¹ See *Camarda, supra*. As a result, the sixth cause should be dismissed.

4.0 Conclusion

In light of the foregoing, Defendants respectfully request this Honorable Court dismiss the matter for lack of personal jurisdiction, for improper venue and/or for failure to state a claim. Though this case properly should have been brought in Texas as Defendants are not subject to this Court's jurisdiction, none of the claims would succeed there. All of the speech at issue is protected and the matter should be dismissed on the merits.²²

²¹ To the extent Plaintiffs claim "disparagement", as distinct from defamation, this must fail. Any asserted disparagement of Mr. Klayman is in his legal abilities—a field in which there is no plausible basis to suggest Defendants are competitors. And the alleged disparagement of Dr. Corsi relates to his recollection of events, not to his abilities as a political commentator, thus it is not disparagement of his goods, services, or methods.

²² Plaintiffs' suit arises from speech "in furtherance of the right of advocacy on issues of public interest." D.C. Code § 16-5502. Because Defendants are entitled to dismissal as a matter of law, Plaintiffs cannot demonstrate likelihood of success on the merits, and, were it applicable in this Court, Defendants would be entitled to their attorneys' fees and expenses. See *id.* Although Defendants recognize that this Circuit does not apply the D.C. anti-SLAPP statute in diversity cases, Defendants formally invoke it now and move to dismiss thereunder, in the event that holding is subsequently superseded. See *Abbas v. Foreign Policy Grp., LLC*, 783 F.3d 1328 (D.C. Cir. 2015)

Dated: April 8, 2019.

Respectfully submitted,

/s/ Jay M. Wolman

Jay M. Wolman
(D.D.C. Bar No. 473756)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, Connecticut 06103
Tel: (702) 420-2001
Email: ecf@randazza.com

Marc J. Randazza
pro hac vice pending
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Tel: (702) 420-2001
Email: ecf@randazza.com

Attorneys for Defendants

RANDAZZA | LEGAL GROUP

CIVIL ACTION NO. 1:19-cv-00656-ESH

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document was filed and served upon all parties of record on April 8, 2019 by CM/ECF, the court's electronic filing system.

/s/ Jay M. Wolman

Jay M. Wolman

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

**DR. JEROME CORSI and LARRY
KLAYMAN,**

Plaintiffs,

vs.

**INFOWARS, LLC, FREE SPEECH SYSTEMS,
LLC, ALEX E. JONES, DAVID JONES, and
OWEN SHROYER,**

Defendants.

CIVIL ACTION NO. 1:19-cv-00656-ESH

DECLARATION OF JAY M. WOLMAN

I, Jay M. Wolman, hereby declare as follows:

1. I am an attorney admitted to practice law in the District of Columbia and am a member of the bar of this court.

2. I am an attorney of record for Defendants, in this matter, and I submit this Declaration in support of Defendant's Motion to Dismiss, filed herewith.

3. On March 20, 2019, I visited the URL appearing at Footnote 9 of the Complaint, <https://www.youtube.com/watch?v=UuXPAn0nZo8>, whereupon I clicked on "Open Transcript", copied the text of the video that appeared, and pasted it into the document appearing as Exhibit 1, filed herewith.

4. On March 20, 2019, I visited the URL appearing at Footnote 13 of the Complaint, <https://www.youtube.com/watch?v=ANfe9d7YzL0>, whereupon I clicked on "Open Transcript", copied the first 52 minutes of the text of the video that appeared, and pasted it into the document appearing as Exhibit 2, filed herewith.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on April 8, 2019.

/s/ Jay M. Wolman

Jay M. Wolman

EXHIBIT 1

Transcript of October 26, 2018 Video

Closed Caption transcript provided in video appearing at
<https://www.youtube.com/watch?v=UuXPAn0nZo8>

Last accessed: March 20, 2019:

00:02

[Music]

00:22

shut up Roger stone or destroyer in

00:25

about 27 minutes and look I like dr.

00:28

Jerome Corsi I've been interviewing him

00:30

for 18 19 years he's supposed globalism

00:33

really helped Lou Dobbs to a lot of his

00:35

work he was a CNN but I gotta be honest

00:39

with you without saying too much when I

00:40

was in DC about six months ago with dr.

00:46

Corsi he seemed to mentally be extremely

00:51

degraded to the point of what I would

00:53

call dementia uh and I respected him

00:57

when he liked cue it on that he said cue

00:58

it ons bad and then I agreed with him

01:00

and then all that doesn't get proven I'm

01:02

not throwing course to the bus here but

01:05

of course he won't even return my phone

01:07

calls and the last time I saw him I was

01:10

in a steakhouse in DC not even knowing

01:13

he was there he walks in eats by himself

01:15

and then falls down on the ground and I
01:20
had five security people with me we were
01:22
staying in a hotel next to his I guess
01:24
they took him back they thought he was
01:26
dead at one point and folks you know I
01:29
only say what's true I have all the
01:31
witnesses it happened and it was at that
01:34
point he was a contract rider for
01:36
Infowars I let him go the next week and
01:39
I just said hey thanks for your services
01:42
his one-year contract just so happened
01:44
to be ending in about a month I paid out
01:45
the last month out of it and that was
01:47
the last I saw of course he next Muller
01:50
calls him in and now we're here
01:54
so I don't want to say these things on
01:56
air but you know what the truths the
01:57
truth I'll say it I'm sit there eating
02:00
the steak drinking red wine and he's
02:02
he's on the ground at another table we
02:05
had to help him out of there man
02:06
they thought he was dead in the elevator
02:08
in fact if they were formed these were
02:10

actually current Navy SEALs Delta for
02:13
you name it they were like about to call
02:14
an analyst they thought his heart
02:15
stopped they were like listening to his
02:17
chest and that came back and then they
02:19
had to carry him to his hotel so that
02:21
happened on my Sheldon I'm not
02:23
discrediting Corsi I'm telling you what
02:25
happened so I think he's got dementia or
02:29
a stroke I mean I don't know so he's a
02:34
really sharp brain up until about a year
02:35
ago Muller subpoenas Jerome Corsi
02:37
birther and that's challenged Jones
02:39
associate Muller reportedly has evidence
02:41
that Rogers telling associate new
02:43
Clinton campaign emails have been stolen
02:46
and given to WikiLeaks evidence still
02:49
associate new Clinton the email late now
02:52
folks this is why this is so crazy I was
02:55
there in June July August before Roger
03:00
stone was working with Infowars as the
03:02
key was that Fox News consultant Tim and
03:04
so is course he I'm just got consultants
03:06

working here these are great sources and

03:10

I'm sitting there and I'm talking to

03:13

Roger stone because you know WikiLeaks

03:15

Julian Assange is on Fox News he said

03:18

CNN he's on New York Times videos and I

03:21

said you know he needs to come on my

03:23

show we're exposing all this and I

03:26

called him a Hillary buttplug and all

03:28

that cuz he wouldn't and I'm talking to

03:30

stone I'm proud of course they're like

03:31

yeah we're trying to get journalists

03:33

that are talking to him to get questions

03:34

everyone wanted to know what the

03:36

WikiLeaks work everyone did and so we'd

03:38

say oh we hear it really hurts Clinton

03:40

because WikiLeaks has said it was about

03:43

Clinton and stone that said had had

03:46

talked to that that talk show host in in

03:48

New York I forget a stable says in a

03:50

minute that on record did know Assange

03:52

who's now being flushed down the toilet

03:54

and Ecuadorian embassies not giving her

03:56

support so the idea when when that

03:59

you're a Russian agent if you try to
04:01
talk to a sonj when he's all over
04:03
mainstream news and we never did and now
04:06
of course he says he's the source of all
04:10
this is just incredible so I have to at
04:12
this point because my name is in all
04:14
this and course he won't return my phone
04:17
calls I have to but he was grabbed by
04:19
Muller for days and all I heard was
04:23
either saw Mike it was been beaten with
04:24
phone books or something
04:25
I love dr. Corsi and people get old man
04:28
my grandfather was an amazing person
04:30
World War two vet prospector author
04:33
lease hound oil guy great guy and you
04:37
know he was about 80 years old he had a
04:38
heart attack and they did they fix his
04:41
heart but it said a bunch of stuff his
04:42
brain and I came back over to his house
04:44
you know about a month after the surgery
04:46
and he was like a three-year-old
04:48
tell me about red fire engines and you
04:51
know you know playing marbles isn't
04:53

going poop in the potty
04:55
so motors got a guy talking about poop
04:59
in the potty here and we just have to
05:02
say that that if I've ever seen our had
05:05
a stroke or whatever's going on with
05:06
Corsi that whatever comes out of his
05:08
mouth ain't the truth so Roger stone
05:11
I've done it I just said it all I have
05:12
the truth what the hell is going on
05:15
there because they're reporting this
05:16
everywhere it's pretty simple Alex to be
05:20
absolutely clear there had been a spate
05:22
of leaks from the office of the Special
05:25
Counsel it is technically illegal for
05:28
them to leak but they have been leaking
05:30
like a sieve on the other hand their
05:32
leaks our obliques such as Jerry Corsi
05:37
learned of his own research that Jon
05:42
Podesta's emails had been acquired can't
05:45
remember where he heard it says he
05:48
didn't hear it from massage where
05:49
WikiLeaks but that he told Roger stone
05:52
this had occurred false he was on record
05:57

on this show WikiLeaks said we have
06:01
their emails but specifically in the
06:04
question of Judge John possessed his
06:06
emails I have said Roger you don't
06:09
repeat it
06:10
I remember hounding you and the minute
06:13
WikiLeaks would release stuff we were
06:14
all on the site to grab it and do the
06:16
news the idea that we were talking to
06:18
Assange when he treated us like crap I
06:20
called him a butt plug but in this
06:24
specific case what is being alleged by
06:26
NBC was that course he knew and had
06:30
Podesta's emails in advance
06:32
can't remember where he got them do
06:34
get them from asan she's saying that he
06:36
passed them on to me to be very clear I
06:39
never passed on anything NBC says quote
06:42
stone said he only passed on documents
06:45
that were public no actually I never
06:46
said I passed on anything I just tweeted
06:49
on things so it's more fake news not
06:53
urban let's say what you're guilty of
06:54

you're guilty like I on everybody else
06:57
of hyping a song says this is gonna be
07:00
damning to Hillary were like right right
07:01
right we're gonna cover it we did live
07:03
overnight broadcast and then Assange
07:05
didn't release it I got mad at him I
07:06
mean it's just such a I was there and
07:09
I'm not trying to put Corsi down but
07:11
with the state I saw him in and then
07:14
even after that a few phone calls before
07:16
he wouldn't talk to me cuz he's not
07:18
there and that's why I'm not being mean
07:20
to course he maybe he's better now but
07:22
all I'm saying is Roger this is what
07:25
Muller hinges on now it appears that
07:28
he's gonna put his eggs on this basket
07:30
because Randy credit go is not a
07:32
credible witness he told me that Assange
07:35
had this material and he would publish
07:36
it in October he told me that
07:38
consistently for a 15 day period there
07:41
are third-party witnesses he said - he's
07:43
out of his mind he's confident that's
07:46

the New York talk-show of New York
07:48
talk-show host everything I've said
07:49
about him under oath is accurate in the
07:52
case of Jerry Corsi to be clear
07:54
NBC didn't include this on the record
07:57
categorical denial
07:58
Jerry Corsi never told me that he was
08:00
aware of the acquisition of John Podesta
08:02
Z mails and that he never passed
08:04
anything of the sort on to me they
08:07
exclude that quote from their story so
08:10
it's just more fake news the other one
08:13
Roger stone advocated a pardon for
08:16
Assange as if this is a secret we spoke
08:19
about it here at fors we ran a petition
08:25
to do it but I wrote about it for the
08:28
Daily Caller
08:29
I wrote about it for Infowars I always
08:31
say what we do on airs like some secret
08:33
so listen everybody's sick a Russia gate
08:35
but it's good to cover what about roses
08:37
seat a month ago telling trumpets / and
08:39
signals of that do you think that is BS
08:41

what's extraordinary alex is that
08:44
Rosenstein is being allowed to be tattoo
08:47
to testify to the Congress behind closed
08:50
doors with only the two senior members
08:53
two Republicans two Democrats and the
08:55
stenographer the other members of the
08:57
committee are being denied the right to
08:59
perform their sworn constitutional duty
09:02
of oversight why is why is mr.
09:05
Rosenstein getting special treatment
09:07
when everybody's supposed to be treated
09:09
equally under the law
09:10
there's ample evidence that he that he
09:13
offered not jokingly to wear a wire to
09:16
entrap the president under the 25th
09:18
amendment know they can go in in the
09:20
vendée see that's not a joke
09:22
and the New York Times story I think is
09:24
covers this with multiple sources so no
09:27
not agree with you and we don't want to
09:28
turn the FBI into a praetorian guard
09:30
that's so Royal Academy questioned by
09:33
Congress it's very Friday let's come
09:34

back with Rogers Town straight ahead
09:36
because where are we look at the tail
09:38
end of Russia gate or something even
09:39
bigger plus Democrats are trying to stop
09:41
them trying to crash the stock market
09:43
right now
09:44
nothing is very clear a very corrupt
09:48
group of bureaucrats and intelligence
09:50
agency people working with foreign
09:52
governments hijacked the country sold it
09:53
out all became billionaires and now
09:56
they're pissed that we don't want to
09:57
live under them and then dr. Corsi oh I
10:00
think it's a great gun a good guy it's
10:02
targeted in all this and then you see
10:04
mainstream media saying things that
10:05
maybe not even true I was pointing out
10:07
that I've seen him appearing to be ill
10:09
from a stroke whatever the case is and
10:12
I've been really worried about him and I
10:15
know Roger you're in this in the
10:17
crosshairs of this so you want to defend
10:19
yourself all the time I don't think
10:20

anybody buys that you've talked to the
10:22
Russians or that Assange is a Russian so
10:24
I don't even talk to Assange which we
10:26
didn't because he was being a little
10:28
establishment Punk at the time and now
10:31
they've hung him out to dry but they
10:32
didn't because he was a Russian or we
10:34
were a Russian so moving on past all
10:36
that I don't see them covering Muller's
10:41
but you mean the last few weeks there's
10:42
but nothing now suddenly this thing
10:44
which shows they're going after people
10:46
that when I've seen them you know aren't
10:49
aren't aren't aren't aren't doing too
10:50
well physically or mentally so it's the
10:53
end of the day if they get me after I've
10:56
had a stroke or something yeah they
10:58
could be saying on the Tooth Fairy it
11:00
doesn't matter but I don't think anyone
11:01
buys the Trump's a Russian agent or that
11:04
URI at this point if teri course he knew
11:08
in advance about the hacking the alleged
11:10
hacking of the DN stay and past
11:12

documents on to Donald Trump I don't
11:14
know about it I know that I had no
11:17
advance notice of the source of the
11:18
content of any of the WikiLeaks
11:20
disclosures including those regarding
11:22
John Podesta I said so under oath
11:24
contrary to what swallow island ships
11:26
say my testimony is entirely accurate
11:30
and truthful and I will prove that if
11:32
I'm called upon to do so but Alex this
11:34
is a plan let make sure you understand
11:36
the plan number one step one take down
11:39
Alex Jones shut Infowars down that's
11:43
step one in their plan step two get
11:45
Roger stone out of the way step three
11:48
the House of
11:50
you know I agree that they have to
11:53
demonize silence and destroy us before
11:55
something big happens so even though we
11:58
said oh no this is ridiculous what is it
12:01
they're planning in their whole crazy
12:02
system absolutely clear they were if
12:06
they win the House of Representatives
12:07

they will vote articles of impeachment
12:09
against the president
12:11
forget Russia collusion other than
12:13
trying to pursue me on some bogus charge
12:17
based on something Jerry Corsi never
12:19
told me or may not even know they they
12:23
failed so now the new argument will be
12:25
the president sexually assaulted these
12:27
19 women from the 2016 campaign they
12:31
will have no evidence or no proof and no
12:33
corroboration but you've seen the dry
12:36
run for this you've seen the dress
12:38
rehearsal let's go back to course II
12:41
believe mainstream media what they say
12:43
he's saying he was told that Assange had
12:47
stuff on Podesta the head of the Hillary
12:49
campaign and gave it to you which would
12:52
mean you have perjured herself the
12:53
Senate that's totally new he previously
12:56
wrote all these articles saying that
12:58
wasn't the case so it's it's what what
13:01
the hell does that mean it contradicts
13:04
everything he has written said here on
13:06

enforce it is not true he never told me
13:09
that anything about the acquisition of
13:11
Podesta's emails and he never passed on
13:14
anything but was there we weren't
13:17
bitching that we couldn't get what they
13:18
were what's wrong we do that's what
13:21
journalists do and as I have said
13:23
between the Breitbart piece on August
13:25
14th that pointed out that Tony Podesta
13:28
was the was working with Paul manna port
13:31
for the same Ukrainian political party
13:33
and the Panama papers dissertations
13:36
about know if you defend yourself to
13:38
this audience and it's like they already
13:41
know it Robert I mean I get why you
13:43
defend yourself but I don't see any of
13:49
it flying and I just feel bad for course
13:50
he and I have to point out that I the
13:52
times I've seen he looks very very sick
13:54
so whatever comes out of him I feel
13:55
sorry for him and you know hope he gets
13:57
help we care about other course he and
13:59
lord knows what he's been through he's
14:01

been a great pain for this country
14:02
have to say what I've seen shipping
14:05
gears the pipe bombs the immigrant
14:09
caravans this like the Democratic Party
14:11
is committing suicide in front of us
14:13
well if this is all part of the same
14:16
mosaic they are hysterical the only
14:19
reason that someone would do this highly
14:22
suspicious pipe bomb stratagem as if
14:26
they were reading polls that show that
14:28
they are slipping that they are losing
14:30
we predicted this right here on Infowars
14:33
we told you there would be some big
14:35
dramatic event just before the election
14:37
that was staged a to help defeat Donald
14:41
Trump and the Republicans here it is I
14:43
mean while they try to sidetrack me with
14:46
this nonsense
14:47
I want to be in the main fighting
14:48
talking about the caravan talking about
14:51
these bike bombs so in a way it's an
14:55
attempt to get me off kilter but I also
14:57
know that in America when people accuse
15:00

you of things if you do not respond to
15:02
them unfortunately they assume you're
15:05
guilty I know I get that act like you're
15:06
guilty I I just you know I was there
15:09
when I had my whole crew sending emails
15:11
to WikiLeaks going hey you go on New
15:13
York Times you go on CNN come on us and
15:16
and then and then I remember you
15:18
remember going Roger said you get it
15:20
well I've got a contact through New York
15:23
we're really pressuring to come on I go
15:25
well that'd be great I mean I remember
15:28
you couldn't get ahold of them so then
15:31
the idea that we're lying and we're in
15:34
the bed with Russians because we can't
15:36
get the supposed Russian agent on is
15:40
just horse manure Roger stone you're
15:41
gonna be on during the war where I'm
15:42
coming up on him yes indeed look the
15:46
Democrats are really freaking out you
15:49
can tell Hillary Clinton was perfectly
15:50
made up coughed how poised and so on I
15:53
believe that the teleprompters were
15:56

loaded before the story about the bombs

15:59

even broke this is such an obvious a

16:02

false flag and obvious also notice none

16:06

of the ball bombs went off notice none

16:09

of the juror Frank

16:11

Cobb's Roger thank you you're coming up

16:13

Orem everybody we don't get the word out

16:15

if you don't get the word out we don't

16:16

win if you don't take action so I'm not

16:19

bitching at ya I love you you're amazing

16:20

listening on the am/fm TV cable info

16:25

wars.com for slash show whatever you do

16:27

subscribe the free podcast the Alex

16:30

Jones Show David Knight or remote lawyer

16:34

whatever you do take action today

16:37

and whatever you do realize that this is

16:40

the fight for the future of humanity

16:42

with people that want to promote a pro

16:44

human future versus those that want a

16:46

pro tyranny future and please don't

16:49

forget I'm sorry - Garrett Shane and

16:51

Greg and Chris we're out of time call

16:53

back tomorrow you on four other line eld

16:55

experts really appreciate and respect
16:56
you thank you we're out of time please
16:59
realize this special has to him this
17:02
weekend biggest sale on our history
17:03
free shipping storewide 50% off the
17:06
nutraceuticals 35% off the highest
17:08
quality storable food we even get even
17:10
higher quality for triple the price but
17:12
it's the highest quality for the good
17:13
decent food it's all there
17:15
x2 selling out last run 50% off brain
17:18
force plus amazing new Trump at 20%
17:21
morning Spotify set off body's ultimate
17:23
turmeric formula 95% humanoid nobody's
17:26
got that 50% off alpha power incredible
17:29
for scam and libido energy the strongest
17:32
formula out there from our research 40%
17:35
off and we're finally getting reviews in
17:37
for regulars complete and gut fusions
17:39
brand new product those are amazing
17:41
those are 50% off out of the gates super
17:43
male vitality final run because it cost
17:45
so much to make it take so long I'm I'm
17:47

terminating that product it was popular
17:49
Alexa pure water filtration systems
17:51
they're discounted info wars.com info
17:54
wars live.com you have stood with us
17:57
against the globalist we've changed the
18:00
world everybody else is over tip of the
18:02
spear would change the world we've
18:03
really done it because of you and they
18:06
want to shut down so go there get a
18:08
t-shirt get a book get some nauseum are
18:10
heirloom seeds the lowest prices out
18:11
there get water filtration get air
18:13
filtration kit the supplements imagine
18:16
you know all the products we've got the
18:18
secret 12 where's the top out of me 12
18:21
of the country knocked out amazing
18:23
natural sleep
18:23
it's all fair enforced or calm in fours
18:28
live.com or Triple A two five three
18:30
three one thirty-nine
18:31
all right warum starts on our satellites
18:35
and everything in like two minutes then
18:37
full works.com force less show with
18:39

Rogers Joan on Schroyer had so much more

18:41

these pipe bomb things have really

18:44

nobody's buying and it's amazing and

18:47

megyn kelly just got fired just a lot of

18:49

craziness but whatever happens pray for

18:51

him for us because your prayers are what

18:53

takes us over the top

18:54

I need your prayers I don't just believe

18:56

in them I depend on them thank you so

18:58

much for your prayers please pray for

18:59

employers and for America

EXHIBIT 2

Excerpted Transcript of January 21, 2019 Video

Closed caption transcript (excerpt) of Video appearing at:

<https://www.youtube.com/watch?v=ANfe9d7YzL0>

Last accessed: March 20, 2019:

00:00
over 20 years ago Alex Jones created the
00:03
media platform called Infowars
00:05
and in the decade since it's grown into
00:07
a truly remarkable institution with over
00:10
200 radio affiliates tens of millions of
00:13
unique website visitors monthly and a
00:15
24/7 live news TV channel broadcasting
00:18
from state-of-the-art studios in Austin
00:20
Texas Infowars has become the most
00:22
trusted independent news source in the
00:24
country dedicated to delivering breaking
00:26
news live coverage of special events and
00:29
exclusive reports you won't find
00:31
anywhere else while the old guard media
00:34
struggles to maintain supremacy in a
00:36
landscape brought by innovation and
00:38
technology Infowars has been at the
00:40
forefront of the information revolution
00:42
from 8 million radio listeners over 2
00:46
million YouTube subscribers or the
00:48
billions of views of our online content

00:50
Infowars proves dominant in every facet
00:53
of media we entered
00:55
for the hardest-hitting reports
00:57
uncompromising Alice's for high-profile
01:00
interviews and bombshell revelations
01:02
accept no substitutes
01:07
demand Infowars Infowars tomorrow's news
01:12
today ladies and gentlemen the bullet
01:15
just hit the bone as we entered the
01:18
twilight zone there's the headline
01:20
Beijing confirms birth of Jean edited
01:23
babies not really humans ladies and
01:27
gentlemen but by the true definition
01:29
humanoids China confirms the birth of
01:32
Jena it had babies and vows to punish
01:34
scientists he John Koo who violated
01:39
rules to carry out the unethical study
01:40
for personal Fame oh that's why he's in
01:43
trouble
01:43
ladies and gentlemen this has been going
01:45
on a long time there have been human
01:47
clones in petri dishes for 40 years
01:53
that's just boilerplate one of the

01:57
things we have here you know sometimes
01:59
something happens in the corporate fake
02:02
news world in these formulaic deceptions
02:08
they involve themselves that goes
02:09
completely mega viral and that happens
02:17
in the last two days we were there the
02:19
women's March our crew covering it's
02:21
Saturday and Rob do Saturday afternoon
02:25
sent me footage and said look at this
02:27
they're claiming that these students are
02:28
asked and and encircled some for Native
02:31
American people and we went and found
02:37
the raw footage and they're calling them
02:40
white scum I mean I've got the list here
02:44
some of the black kids that were there
02:46
with them from the school they were
02:47
calling them traitors and saying we're
02:49
gonna harvest your organs they were
02:51
calling them fags and queers and gay and
02:57
the N words being yelled as well and
03:00
people are calling now for the students
03:01
to be killed their school to be burned
03:03
down than to be shot

03:04
Twitter's leaving it up and agrees with
03:06
it and then NPR had Nathan Phillips on
03:13
this morning nobody's picked this up we
03:16
had to go find it on NPR in a snake-like
03:19
voice with a snake
03:20
presenter going this young man needs to
03:25
apologize fully did to us we've got to
03:29
put this this this audio to all the raw
03:31
video I was so powerful it's a terrible
03:34
what they did that based on a lot of
03:36
what has happened in our country
03:37
recently you you were under the
03:40
impression or making an assumption that
03:42
that a large group of young white men
03:45
might threaten a minority who you saw
03:48
and you saw this group of black Israel
03:50
Hebrew Israelites is potentially in
03:53
danger by this this large group of white
03:55
men based on what you had seen in the
03:57
news in our country in recent months and
03:59
years yes thank you for that clarity
04:02
because that's let's stop right there
04:05
the snake people they could be Native

04:08
America that could be white there could
04:09
be black all talk in this very soft
04:13
deceptive voice you know the spider by
04:17
the voice now the truth is you've got
04:20
this particular group of quote black
04:21
Israelites who are a diverse group a lot
04:23
of those folks are my listeners I run
04:25
into a bitch around Houston and in
04:26
Dallas in LA there's a lot of them and
04:28
they seem to be pretty woke a lot of the
04:30
time but this particular group is mixed
04:34
in with a bunch of other white people
04:37
Native Americans who start virtue
04:39
signaling how much they hate being white
04:42
and so you've got blacks you've got
04:44
whites you've got Native Americans
04:46
screaming and we're gonna play this
04:49
audio it's it's all garbled but people
04:51
have isolated it and the young people
04:52
have talked about it in their faces
04:54
while there's beating drums they march
04:56
up March of the middle of them waiting
04:57
for their bus that he said they're

04:58
pro-life March and they're screaming
05:01
we're gonna kill you you faggots we're
05:05
gonna kill you and take your organs
05:06
they're like let's go let's go let's get
05:08
on they're like yeah it's on bitches and
05:10
they march over to the middle and some
05:13
of these kids are as young as 10 they
05:14
just sit there and do their school chant
05:17
so they were scared with a bunch of men
05:20
coming up threatened to kill him and
05:22
then NPR says they're bad kids ladies
05:26
and gentlemen there are moments when you
05:30
know the world's gonna change
05:31
like Martin Luther King speech I have a
05:33
dream
05:34
there are positive moments there also
05:35
negative moments and I can tell you the
05:38
zeitgeist that's been hit with the
05:41
mainstream corporate media from ABC to
05:43
CBS to NBC to NPR to all the local TV
05:47
stations where I live all saying did you
05:50
see the young gang of light supremest
05:53
wearing make make America great again it

05:56
hats go up to an innocent elder this
05:59
wonderful good loving man and ridicule
06:05
and attack him viciously notice that on
06:11
all these different channels in places
06:13
they don't show more than one or two
06:14
seconds of video or audio that's because
06:18
you've got this group of Native
06:19
Americans blacks and whites saying look
06:26
at them they're over there let's go get
06:29
them they're a bunch of fags let's kill
06:32
them and take their organs you white
06:34
pieces of crap you white people need to
06:37
die they hear hundreds of people yelling
06:40
this at them they're waiting for their
06:42
bus you can watch the raw video it's up
06:45
on info wars.com or the placement of it
06:46
here and this is your the whole woman's
06:49
March they were just there for a right
06:51
to life pro-life March that these
06:53
minorities should be thanking God that
06:55
there are mainly white pro-lifers out
06:58
trying to stop the abortion as most
07:00
abortion is quote minorities but they

07:01
don't care out the real trying to fight
07:03
genocide will threat to them they see a
07:07
Catholic school group only a couple
07:10
black guys couple Hispanics maybe 3040
07:13
other white kids over there and that
07:16
first cuz there's like six minutes of
07:18
video there's a bunch of Channing and
07:20
beating and then they keep saying look
07:22
they're wearing red hats so they start
07:24
yelling at them and screaming and then
07:25
they march over and bust it in the
07:29
middle of them and do all these terrible
07:32
things to them and then the media says
07:35
they're Nazis and so then Twitter and
07:38
I've got articles up on him fours come
07:39
all the tweets hundreds of tweets from
07:41
Kathy Griffin and
07:43
quote rock-and-roll stars and people say
07:45
I want you to go to their school and I
07:47
want you to shoot every one of them if
07:50
you're a true fan of shoes I want you to
07:52
fire on any of these red hat bitches
07:54
when you see them on sight

07:56
lock the kids in the school and burn
07:58
that bitch to the ground so there's
08:02
somebody saying he's a school shooter
08:03
and he wants others adjoining he will
08:05
not be arrested he will be worshipped
08:08
Twitter is leaving him up and says it's
08:10
authorized and it goes on from there
08:12
with Kathy Griffin saying find them get
08:14
them their families are being death
08:15
threaded in mass and Twitter is still
08:17
not apologizing I went to these
08:19
different sites today this shoes guy
08:21
that you know looks like a child
08:23
molester I don't know he is probably not
08:25
probably under 'fl persons he sees wants
08:27
to kill kids he just wants to burn him
08:28
down and murder him he doesn't want to
08:29
molest him so I guess he's worse than
08:31
that and so here he is saying all this
08:34
and I went to his Twitter he's still
08:35
defending it Kathy Griffin says
08:39
dachshund I want names shame them don't
08:42
worry they did I want names a lot of

08:47
them were just wearing red team hats
08:48
human wearing megawhatts others are
08:50
wearing blue hats but there were a few
08:52
Trump hats in there and so when the mob
08:54
of anti white anti-trump races walk the
08:57
forty yards over they suddenly learn oh
08:59
my god these are all team hats their
09:03
school colors are red white and blue oh
09:05
my god there's only a few of them with
09:07
mega hats so then they go get nervous
09:09
and start screaming we're going to kill
09:11
you just all being screamed and yelled
09:15
and so stoic Lee they sit there and they
09:18
take it and they simply chant their
09:24
school songs their pep rally songs and
09:30
the little black kids that are where the
09:32
part of the school are big scream we're
09:34
gonna take your organs we're gonna kill
09:35
you boy
09:36
and then this guy has the nerve Nathan
09:40
Phillips who led the the race's gang
09:42
over towards what he thought was a group
09:44
of Trump supporters only he goes on NPR

09:47
and they snake like worship Him and he
09:51
says these kids ought to be ashamed of
09:53
themselves they're such bad
09:55
why were they there I felt like the
09:57
black men oh yes the hundreds of black
10:00
men of the black Israelite movement that
10:03
says that they're the master race and
10:05
all the rest of this stuff and fine you
10:07
said if you want that's your right this
10:09
poor group that says there's a master
10:10
race we're just over here as portable
10:12
Native Americans never hurt anybody
10:14
we're so sweet Ling Ling Li we're so
10:16
nice to each other on our own
10:17
reservations HEIs crime rate murder rate
10:19
the drug rate alcoholism rate I'm very
10:21
sad for them but Oh were these perfect
10:23
good people with with it some white
10:26
trash with us virtually singling saying
10:28
you know kill these white boys and they
10:32
get over there and there's some black
10:33
kids from school they're like hugging
10:35
their buddies cuz they're like ten years

10:36
old like you know these are they're
10:38
loving school family and then they've
10:40
just got a racist mob telling him
10:42
they're gonna die but don't worry
10:44
NPR doesn't play any audio or anything
10:47
NPR did to play them saying we're gonna
10:49
kill you white scum we're gonna play the
10:51
audio coming up you can hear it the mail
10:53
a confirming what the student said no
10:54
they play the snake like the presenter
10:57
and the snake like you know evil wizard
11:01
like little conman coming over and
11:04
bullying children you know I've got some
11:09
Native American roots and I'm not
11:10
ashamed of them but let me tell you
11:12
you've been around the reservations
11:13
you've been around Native Americans some
11:15
days I wonder if I'm proud of it I'll
11:17
just be point-blank with you because
11:19
there's just it's in this modern world
11:20
Native Americans in my experience are a
11:23
bunch of violent liars and con men on
11:26
average who think everybody owes them

11:29
something and they go around bullying
11:30
and hurting whoever they want and I'm
11:32
sick of it I'm sick of Nazis I'm sick of
11:35
black supremacist I'm sick of Native
11:37
American supremacist that feed on their
11:40
own tribes and their own people in my
11:41
experiences you'll know why the Native
11:44
Americans lost because their elders sold
11:46
them out you want to know why because
11:49
their culture was inferior to the
11:51
Renaissance of Christianity
11:52
that's why and instead of embracing this
11:55
culture they sit there and buy into the
11:57
whole me tube movement and piss all over
11:59
themselves and I want a good Native
12:01
Americans as well and they reject all
12:03
this crap excuse me I get a little angry
12:06
looking at this guy who's gone on CNN
12:08
everywhere
12:09
and what a big victim he is when there's
12:11
he's with a group screaming we're gonna
12:13
kill you
12:16
bullying people and then that's what

12:19
this turns into
12:23
no they marched over there to start a
12:25
fight he marched over there to take a
12:28
scalp that's what he did you know why
12:32
the Westerners didn't didn't like lot of
12:34
they have Americans because they kill
12:35
women and children and they rape them
12:41
fountains of goodness falcons of love
12:45
fountains of perfectness it's disgusting
12:53
now let's go ahead and go to the snake
12:55
like NPR you listen to this for yourself
12:57
here it is are you saying that that
13:00
based on a lot of what has happened in
13:02
our country recently you you were under
13:06
the impression or making an assumption
13:07
that that a large group of young white
13:09
men might threaten a minority who you
13:13
saw and you saw this group of black
13:15
Israel Hebrew Israelites is potentially
13:18
in danger by this this large group of
13:20
white men based on what you had seen in
13:22
the news in our country and in recent
13:23
months and years yes thank you for that

13:27
clarity cuz that's that's what it was in
13:30
my mind and in my heart because when I
13:34
seen those those young men I was seeing
13:37
their faces and the thing is is that
13:41
those young man could have chose to not
13:45
feed into those guys those Israelite
13:49
fellers they could have chose the the
13:52
students teachers the students
13:54
chaperones could have instructed those
13:57
students to exit that area that this
14:01
wasn't something that they needed to
14:04
bring their high schools into and being
14:06
involved in can I can I ask a question
14:08
there's so much I'm so good and I'm over
14:13
here with a group of black Israelites
14:15
full grown adults and 40 50 yards away
14:18
there's a bunch of kids wearing a red
14:21
white and blue because that's their
14:22
school colors and they're at a prayer
14:23
March for babies a pro-life March and I
14:26
might tell her just to let them know
14:28
that I wasn't gonna put up with it cuz I
14:30
needed to protect I needed to protect

14:33
the black people that said there's a
14:35
master race
14:36
I need to do that right away and then
14:39
the NPR person so empathetic it's so
14:42
real oh can I hold on can I say
14:45
something to you now now we come back
14:47
we're a play the raw footage yeah then
14:48
we're gonna play footage the raw footage
14:50
where I add women come up a few months
14:52
ago in DC saying you're you're white in
14:55
bread worm your mother's married to your
14:57
brother you're a monkey and then the
15:00
media said the opposite this story is so
15:02
huge radio listeners have to go to info
15:05
wars.com and news Wars calm and see the
15:07
raw videos for yourself / TV bureau is
15:09
about to roll some of them because it
15:11
shows the anatomy and how they engage in
15:13
the fraud the the group that broke it
15:16
works with Facebook and they did the
15:19
exact same fraud on me with another
15:21
group of quote Native American people
15:23
where these women walk up blow cigarette

15:25
smoke in my face call me a monkey say my
15:29
mother's married to her brother and that
15:31
those are my parents and that we're
15:34
gonna die out and f you and all this
15:37
other crazy crap and I say my goodness
15:40
you're Brown KKK how racist of you they
15:43
edit out all of the stuff they said them
15:45
coming over and confronting me and then
15:48
say Jones viciously gets in the face and
15:51
accost Native American women by calling
15:55
them Brown KKK it's called now this and
15:57
I am letting not now this note there at
16:00
the top of the list to be sued for
16:01
defamation we are going to be filing
16:03
suits there's so much defamation we've
16:05
got to teach people though that we're
16:06
going to do it you accuse me of
16:09
harassing Sandy Hook families to send
16:10
people their houses I never did it but
16:12
then meanwhile they have all these
16:14
programs where they go and harass kids
16:16
and other things in public and harass
16:18
Trump supporters and then edit the

16:21
videos and say that we harassed you
16:23
you've got Kathy Griffin and all these
16:26
other people saying go to their houses
16:27
attack them
16:28
you've got people saying kill them blow
16:31
up their schools shoot them burn their
16:32
school up it's all over the place and
16:34
the media a day and a half two days
16:37
after this all got exposed as a hoax
16:40
they're still defending it everywhere
16:44
there's a powerful meme that's post so
16:46
infowars.com
16:47
in the live feed section you'll never
16:49
guess which behavior the me
16:50
deemed inappropriate for society that's
16:53
right the gay mag is a naked man posing
16:56
with a eight-year-old boy in a
17:00
pedophilic stance but they said it's
17:02
improper for a stoic young man to sit
17:05
there with a friendly smile on his face
17:07
while people are screaming around him
17:09
we're gonna harvest your organs we're
17:10
gonna kill you everything else now let's

17:14
go ahead and roll some video that has
17:17
had analysis added to it and we have the
17:21
raw video posted info wars.com The Daily
17:24
Caller put this together here it is this
17:25
is the raw footage of the group of
17:28
women's March leftist bottom feeders
17:33
types screaming all these horrible
17:35
things grown men like it's a motorcycle
17:38
gang hell's angles versus the Bandidos
17:41
marching over to a group of school kids
17:44
some as young we are now learning as
17:46
seven so here's a group of men coming
17:49
over and telling as young as seven year
17:50
olds we're going to kill you and take
17:53
your organs and then this is turned into
17:55
their portable victim service
17:57
[Music]
17:58
[Applause]
18:02
the Native American elder approaches the
18:05
Covington Catholic students marches over
18:09
40 yards
18:14
it goes on that Covington Catholic
18:16
students waiting for the book school bus

18:18
Native American elder approaching he can
18:24
trigger an event and lead the group that
18:27
then comes in behind it they come in
18:47
there beating drums and so the kids are
18:51
doing their own chant but the media only
18:53
chose to show this later part it looks
18:55
like they've surrounded it that goes on
19:00
for a minute after minute listen listen
19:02
carefully you hear we're gonna kill you
19:03
we're gonna take your organs someone
19:08
gets in your face and beats the drum in
19:10
it you're the bad person
19:11
we're then subjected to racial slurs
19:14
back it up this is 1 this is 1 all the
19:17
threatening starts 10 seconds go back to
19:21
Europe this isn't your land and now
19:22
we're gonna cut your organs out we're
19:25
gonna kill you and and this is corporate
19:27
media this is anti-american media enemy
19:30
of the people
19:30
the very same group edited this and put
19:33
this out there the raw footage and info
19:35
wars.com

19:35
versus theirs saying this about me
19:39
blowing cigarette smoke in my face
19:42
saying you're gonna die out white monkey
19:45
saying that my mother and my father were
19:47
brother and sister telling me to eff off
19:49
that turns into them Shing I'm a sweet
19:54
little person I'm just a veteran and I
19:55
kept wondering why she would say
19:58
horrible things and then go back to I'm
19:59
just a sweet little veteran a few I hope
20:01
you die it's because it turns out we
20:04
have evidence well we saw soros groups
20:05
paying some of the groups that they're
20:07
testifying off that these women were set
20:09
up to be sinning against me see they're
20:12
rigging this crap folks but the good
20:14
news is people are exposing it I don't
20:17
know this was rigged but the same group
20:19
that gets tens of millions of views that
20:21
Facebook pushes did this to me a few
20:24
months ago at the congressional hearings
20:28
unbelievable oh and it turns out this is
20:30
for 2015 same same amount of American

20:33
how much does a job professional liar
20:36
pay into 2019 or is professional victim
20:39
a more appropriate title and turns out
20:41
he's been a victim before I didn't even
20:43
know this I just said it and they found
20:45
it unbelievable from Fox to get me that
20:48
report turns out this guy's the
20:50
professional victim there's reports
20:51
about it years ago holy mackerel
20:56
but here's the good news here's the good
20:59
news people see through this crap now
21:03
they know what to look for and there's
21:04
cameras everywhere it's backfiring on
21:06
Big Brother show they wanted to try to
21:08
get these lists some of these kids are
21:10
age 7 I just can't believe that this
21:15
didn't blow up with there were teachers
21:17
and people there but they I don't hid
21:18
behind everything man I got to tell you
21:21
this is unbelievable please go back to
21:22
the raw footage
21:26
[Music]
21:59
daddy kisses drank you're gonna see your

22:03
president kiss Rudy Guiliani dress to
22:06
the folks it just goes on yeah we're
22:22
gonna organ harvest you we're gonna kill
22:25
you you're a bunch of fags and the media
22:29
all know this and dollars to doughnuts
22:33
that guy this Native American guy got
22:37
flown in there
22:38
in fact there's reports that he's a
22:40
professional victim and it's soros
22:42
funded as usual I mean we know most of
22:44
it is anyways the dam marches but this
22:48
is how their provocateur this is what
22:49
they do and if you go back to em PR when
22:53
we come back we're to play some more of
22:54
this clip there they are with CNN
22:56
everybody else still demonizing still
23:01
demonizing the children a bunch of men
23:05
with clubs oh I forgot they've got giant
23:07
Hickory stick clubs big men big beers
23:11
big clubs we're gonna take your organs
23:15
kids the presidents it's just it's it's
23:21
insane it's it's total evil the media is
23:24
pure evil you know those moments when

23:26
light bulbs go off in your head and then
23:27
more light bulbs go off because I
23:30
remember the first time I ran into
23:31
antifoam in Austin I don't know what
23:35
anti if it was and I was at a pro-gun
23:39
March and they would come up and bump me
23:41
in the back trying to get me to hit him
23:43
while they had cameras on me too then
23:45
me up and then I was at the DNC in
23:49
Denver when Obama was running for office
23:52
back in 2004
23:54
now that was Bush that was 2008 and
23:57
there was the same groups trying the
24:00
same stuff and they would come up and
24:02
say eff you and your family and your
24:04
mother and we're gonna do all the stuff
24:05
to you and then go hey Alex leave us
24:07
alone what's the problem and I wasn't
24:09
understanding they were trying to
24:10
Provocateur me I knew that but for an
24:12
edit to make it look like I was doing
24:15
something I hadn't so they've got
24:18
trained provocateurs so I was on air

24:19
earlier talking about how a quote group
24:21
of Native American women they didn't
24:24
look Native American to me they looked
24:26
Mesoamerican but the point is they came
24:29
up and
24:32
started cussing at me blowing smoke in
24:34
my face telling me you know get out of
24:36
here white man again your mother is
24:39
married to her brother you're a monkey I
24:43
played it before you'll find that son
24:46
infowars.com but but it goes to this and
24:48
then the same group broke it edited
24:53
showing something completely and totally
24:56
different now this so now this broke
25:00
this both times and I said I bet this
25:02
Native American dude is a provocateur
25:05
paid to be there because you know most
25:07
of the women they're protesting cabin
25:09
all the time I was there
25:10
we're paid to be there it got caught
25:12
being paid but now I realize they are
25:14
folks because the women would say f you
25:17
sell these horrible things and then lean

25:19
back and go I'm a veteran I'm a citizen
25:21
how dare you say mean things to me and I
25:23
was like that's weird you're saying the
25:24
mean stuff it's because they had a film
25:26
crew with them they just call their
25:29
people and hey we got Jones out here I
25:31
was out there like 30 minutes on the
25:32
street corner and they swagger up and
25:34
staged their event whole worlds of stage
25:39
well it turns out this individual Nathan
25:43
Phillips is a professional trouble maker
25:46
he claims racial harassment by emu
25:50
students dressed as Indians he was
25:52
walking around the campus and saw a
25:55
group Native American themed party and
25:57
went over and got in confrontation with
25:58
him and now he takes the fence and he's
26:02
a victim and oh they were trying to do
26:04
bad things
26:05
he said oh I felt like they were gonna
26:07
hit me same thing
26:08
he's on NPR I scared for us I mean
26:12
people with doing bad things I felt like

26:15
they were gonna attack us meanwhile it's
26:16
a bunch of students sitting there with
26:19
their red white and blue school outfits
26:21
on a few hours from Pat's it's a
26:23
pro-life March they're coming over
26:31
they're going to harvest your organ you
26:33
little black kids with them your dad
26:39
that's all the audio you know watch it
26:40
listen to it he's played some of it and
26:42
by the time the media gets done it's did
26:45
you see those criminals did you see
26:47
those vicious white supremacist Devils
26:49
me and me to that old elder and it turns
26:51
out he did the same thing to college
26:53
students a few years ago Fox to Detroit
26:58
so this is his this is his profession
27:01
and he's all upset by them and he felt
27:04
threatened by a by a Native American
27:06
themed party poor thing
27:10
that was 2015 so there you go folks
27:14
that's the stick that's the whole stage
27:19
stick that they are engaged in and they
27:22
think you're stupid they think you're

27:23
idiots
27:24
they think you're morons and you you
27:27
have NPR well there it is the power of
27:30
Nathan Phillips song oh he's been in
27:33
vogue last year oh oh he gets arrested
27:38
every town he goes to he says America's
27:42
bad and he makes the full living it
27:44
turns out she just a few minutes of
27:45
searching of this guy ish we learned the
27:49
whole thing's as phony as a plastic
27:51
banana or as a \$3 bill there you go
27:57
we're just having the understanding here
27:59
on air researching together they're in
28:00
their search engine and we're learning
28:02
oh there he is on now this oh that poor
28:05
baby men with clubs saying we're gonna
28:08
kill you to a group of children as young
28:11
as seven and the means he'll and he he
28:15
went on NPR we planted earlier let's
28:16
start with the beginning he went on NPR
28:18
and they sounded like car from Jungle
28:20
Book that the presenter in him just and
28:23
faithfully ate him I'm glad you planted

28:26
out us threatening it was that a group
28:28
of pro lifers were waiting for a bus
28:31
now just let us change your gender and
28:34
take some Rosa this will be very easy
28:38
for you so let's go ahead and roll the
28:41
NPR car audio of this this professional
28:45
agitator search I bet money he's funded
28:48
by Soros foundation nobody wants to bet
28:51
me in their control room look at look at
28:53
who this guy's funded by typing his name
28:55
ins and then type in grants sponsorship
28:58
oh we're gonna find out real fast you're
29:01
like who marches and tries to lead a
29:03
crowd in to attack kids that's in the
29:08
ante for documents we've gotten they go
29:10
to black neighborhoods they have white
29:12
agitators mainly dressed up as an tyfa
29:14
and mass try to get them to start a race
29:16
war that's in the documents we got last
29:18
January so let's go back to the NPR
29:20
piece here it is are you saying that
29:23
that based on a lot of what has happened
29:24
in our country recently you you were

29:27
under the impression or making an
29:29
assumption that that a large group of
29:31
young white men might threaten a
29:34
minority who you saw and you saw this
29:37
group of black ISRU Hebrew Israelites is
29:39
potentially in danger by this this large
29:42
group of white men based on what you had
29:44
seen in the news in our country in the
29:46
in recent months and years yes thank you
29:49
for that clarity cuz that's that's what
29:52
it was in my mind and in my heart
29:55
because when I seen those those young
29:59
men I was seeing their faces and the
30:03
thing is is that those young men could
30:06
have chose to not feed into those guys
30:10
those Israelite fellers they could have
30:13
chose the the students teachers the
30:17
students chaperones could have
30:19
instructed those students to exit that
30:22
area that this wasn't something that
30:25
they needed ringed our high schools into
30:28
and being involved in can I can I ask a
30:31
question this way I'm how much of what

30:34
you were feeling was based on an
30:37
assumption that a large group of young
30:41
white men were out numbering a
30:45
small group of of black protesters and
30:48
and assuming that this could be very
30:49
tense and then there could be racism and
30:51
how much of it was about things you were
30:54
actually hearing whether this moment
30:57
yeah the thing is that there was no
30:59
assumption that there was a large group
31:00
there was a large group and there was
31:02
only four black men and so there there's
31:05
no assumption there the young man who
31:07
was standing in front of you has
31:08
identified himself in a statement as
31:10
nicht sanben and you know he said that
31:13
he was intimidated by these other
31:15
protestors so you've got a group of
31:18
schoolchildren some as young as age
31:20
seven waiting for a bus and first it's
31:24
oh they blocked the steps little footage
31:25
as the steps are blocked they're not
31:26
sitting steps they're sitting over on

31:28
the side next it's oh I felt scared
31:30
there were white people yeah you're so
31:32
damn racist oh now it's only for black
31:34
guys you mean the for black Israel's was
31:36
a whole group of people from that from
31:38
the women's March screaming and yelling
31:40
at him but there's a group of about
31:41
fifteen twenty thirty people you bled
31:42
over and then everybody's sitting there
31:45
jumping up and down on the footage it
31:48
firstly walks over with a drum they're
31:49
being really nice kids I'm really
31:52
surprised how nice these children were
31:54
but again this reason I spent so much
31:56
time on this is this is the anatomy of
31:59
fraud this is the anatomy of how the
32:01
left always are professional victims and
32:03
you hear this individual quote Native
32:06
American veteran Nathan Phillips talking
32:11
about how there were black people he had
32:12
to protect Oh a virtue signaler so the
32:15
way he protects them is running over to
32:17
the group trying to keep black babies

32:18
from being killed because they're
32:19
Christian and projecting onto them all
32:22
of their racism all their hate all their
32:25
ignorance all their stupidity and of
32:30
course now we learn little girls were
32:31
also harassed by these folks well yeah
32:35
because you've got a bunch of paid
32:37
provocateurs trying to get a riot going
32:40
there so they could say that this group
32:42
of Trump supporters did this the
32:45
corporate press is America's enemy and
32:47
it's waging war against the people and
32:49
it's moving us towards open civil war we
32:52
must stop this now we've now moved on
32:54
from the two-year fake Russia hoax the
32:57
witch hunt where it goes into an
33:00
inquisition and they started persecuting
33:01
everybody and overturning the 2016
33:04
election because we've been this
33:07
persecuted and this targeted it set up
33:09
as strong the entire fall of America the
33:13
take down the present
33:14
the public itself literally we are the

33:18
eye of the hurricane and are able to see
33:20
things and know things others don't
33:22
in fact I'm not scared of Ronald Muller
33:24
the third I'm not scared of all these
33:25
white shoe boy lawyers who want to be
33:27
tough guys okay I know I've been putting
33:29
this place by god there's your support
33:32
and prayers to now face this test I fear
33:35
for our children and the country in the
33:37
world
33:37
this spirit of freedom and the spirit of
33:41
bullying from the left of the deep state
33:43
of the rogue state and the globalist is
33:45
permeating this country this is
33:48
great of criminals and we will defeat
33:50
these terrorists
33:56
now Roger stones here with absolute
34:00
bombshell information concerning the
34:02
move to take down the president remember
34:04
Russia gate is that everybody knows it's
34:06
a frauds people ignore it
34:07
the left isn't the globalist aren't this
34:09
is their vehicle to install Nancy Pelosi

34:11
Hillary Clinton on record and we could
34:14
stop it together that's why if you're
34:16
listening a local radio or watching on
34:17
TV gotta tell folks everyday about it
34:19
you've got to take the live feed info
34:21
wars.com /o and the live article we do
34:25
every day for the show where we describe
34:27
what the show is about that day how the
34:29
whole claimed that this poor Native
34:32
American was surrounded by evil white
34:34
kids and and they're all terrorists and
34:38
their school needs to be blown up and
34:39
they need to be murdered this is what
34:41
Democrats are saying on Twitter and
34:42
Twitter is allowing it I know this
34:44
sounds insane we have articles on
34:45
enforce calm showing all this turns out
34:49
I said you know look into him being
34:51
professionally paid by Soros boom turns
34:55
out he goes on universities that starts
34:57
fights and tries to follow lawsuits all
34:59
over the country in the same group
35:03
that's funded by Soros and Facebook did

35:07
the same thing to me a few months ago
35:08
when I was in DC saying I harassed
35:10
Native American women they came over and
35:11
said eff you blew smoke in my face said
35:13
you're a monkey whites are subhuman
35:16
everything else
35:17
my mother's married to her brother I'm
35:20
an inbred honky and the news edited the
35:22
tape and I kept wondering I'm not that
35:25
slick I kept wondering again why she'd
35:30
say eff helium family white scum crowd
35:33
for vodka to me and then I would lean
35:35
back to I'm just a veteran a nice woman
35:37
why are you doing this because they were
35:39
getting the edits you have to understand
35:43
these people are pure deception it's who
35:49
they are now joining us is Roger stone
35:52
for this segment the next and then John
35:56
Irving is the guy that launched them or
35:59
helped launch the modern DMT operation
36:03
and he's a good guy he didn't understand
36:04
what's happening was being used by the
36:06
CIA he later learned who was doing it

36:08
and this isn't so much
36:09
let's say of Joe Rogan it's just
36:11
something I've got to do about the dmt
36:15
situation and about unfinished business
36:17
on things where I was so loyal to some
36:21
people that I just kind of blotted it
36:23
out of my head with what I saw right in
36:24
front of me and I talked to John Irving
36:26
and others just confirmed my worst fears
36:28
so that's all coming up for about an
36:32
hour and a half the broadcast starting
36:33
in about 25 minutes
36:34
he'll be joining us for a little bit
36:35
behind today but he's coming up we
36:36
appreciate him okay Roger stone the
36:40
obvious giant bombshells he can
36:41
encapsulate it in the seven minutes we
36:43
have in this segment we'll play the clip
36:44
Giuliani as well last night confirming
36:46
it that I have been a target as Michael
36:52
Caputo and others said the grand jury
36:53
and the questions and many other
36:55
witnesses you've talked to the media

36:56
tries to deny this because they don't
36:58
want to us have any support but the fact
37:00
that they're trying to prepare at the
37:01
end of the which shot to get you my dad
37:03
and myself shows how empty the Russia
37:06
collusion was and how crazy this is but
37:09
now of course he's backing off what the
37:11
Washington Post's others told us that he
37:13
was the source saying that we hired him
37:16
for hush money and that we paid out half
37:18
a year of his contract when I had to let
37:20
him go which I do for senior people
37:21
we've done that many times is that
37:24
that's hush money he says he never said
37:26
that so I want to believe Corsi is that
37:28
true or where is this coming from he's
37:30
now said won't say it's totally false he
37:32
says it's ridiculous and crazy and
37:34
defamatory I mean okay course he's so
37:37
you never told Muller this because we
37:39
know he said things about you previously
37:41
that we're not true what's happening
37:42
here Roger

37:43
yeah Alex I'm really getting tired of
37:45
Jerry courses you know George Washington
37:47
Act oh I will not tell a lie well in all
37:50
honesty unfortunately the good doctor
37:52
stole a number of lies
37:54
in fact he's starting to conflate his
37:56
lies so he now says that he wasn't
38:00
willing to say lies about the president
38:03
and that they told him that he would
38:05
repeat that he would receive probation
38:07
for some charge if he would testify
38:10
against Donald J Trump but they was sent
38:13
into prison for five years if he would
38:15
not but he was perfectly willing to lie
38:17
about me
38:18
fortunately I have the emails and the
38:20
text messages and the metadata to
38:23
demonstrate that everything he said is
38:24
alive no Jerry you never told me that
38:28
John Podesta is emails have been boosted
38:30
you you said on Tucker Carlson you told
38:33
everybody that you said on MSNBC you
38:36
told many people that I don't think you

38:37
told anybody that because you didn't
38:39
know it all right now you're saying that
38:41
I urge I told you ahead of the NBC tape
38:45
a release to tell Julian Assange to
38:49
release the Podesta's email so you're
38:50
conflating your two lies these are
38:52
massive falsehoods by Roger I was there
38:55
I was there with an FBI informant from
38:58
the beginning but now lying about Alex
39:00
Jones lying about Infowars
39:03
lying about dr. Jones who's one of the
39:05
nicest gentlest sweetest most honest men
39:08
I've ever met it's beyond the pale so
39:11
now he's pursing oh I lied about this
39:13
but I didn't lie about that
39:14
Jerry Corsi can no longer be believed
39:17
it's very sad what do you make of
39:20
Giuliani confirming because I guess they
39:23
have a joint defense agreement what do
39:26
you make of Giuliani again the chief
39:28
lawyer for Trump on the whole fake
39:29
Russia gate thing on CNN saying that
39:32
indeed they've given him a script to lie

39:34
about if he won't lie is going to prison
39:36
I mean that's confirming that they're
39:38
giving him the script and telling him
39:40
the lie because it's not just coming
39:41
from Corsi now it's coming from Giuliani
39:42
I believe that to be the case so in
39:45
other words let's walk through this they
39:47
told Cour see exactly what Giuliani said
39:50
if you lie about Donald Trump we'll give
39:51
you a pass if you don't lie about and
39:54
we're sending you to jail Jerry said
39:56
well what if I only lie about Roger
39:57
stone and Alex Jones what if I don't
39:59
implicate the president could we still
40:01
make a deal my guess is that model
40:03
rejected that deal the three things that
40:05
he has said in leaked portions of his
40:07
book about me are demonstrably false
40:09
that's the defamation god here's the bad
40:12
news Gary God's with me God is with Alex
40:15
God knows that you're bearing false
40:16
witness against us in violation of his
40:18
commandments so quit hiding behind God

40:20
in your phony baloney trumped up tweets
40:24
nobody's buying your crap I think you've
40:27
been deep state from the beginning your
40:29
whole birther thing
40:31
uses a club to destroy conservatives
40:33
isn't it ironic that MSNBC is happy to
40:36
have you on that CNN embraces you why
40:39
are all these deep state assets now
40:41
trying to make you a truth teller well
40:43
what I'm trying to do is take down Alex
40:45
Jones and Infowars
40:46
and yours truly so I look forward to our
40:48
confrontation
40:49
I will demolish you you're a fraud
40:52
stirrer out of your alcoholic haze you
40:54
have made up lies about David Jones and
40:57
Alex Jones and Roger stone and now I
40:59
suspect they want you to lie about the
41:01
president now two things have come
41:03
forward here that have not been
41:04
previously reported dr. Corsi has a
41:07
joint defense agreement with the
41:09
president that means Giuliani is privy

41:12
to those documents I believe the mayor
41:14
Giuliani is telling of the truth
41:16
secondarily Jerry Corsi met privately
41:18
with candidate Donald J Trump I was not
41:20
present I don't know what was discussed
41:23
so perhaps the special counsel has
41:25
suggested to Jerry that he makeup what
41:28
was discussed in that meeting just as
41:30
they suggested to him that he claimed
41:32
that he told me that John Podesta Z
41:34
mails had been stolen never said
41:36
anything of the kind no email no text
41:39
message no Quran moment whopper yes
41:42
let's go out the break will come back
41:44
with more but here's Giuliani on CNN
41:46
confirming well of course he's up - here
41:48
it is yeah and I'm sizing the following
41:51
do not think that just because he's
41:53
pleading guilty to something Michael
41:54
Cohen's telling the truth he's got every
41:57
reason to say what the prosecutor wants
41:59
him to say but for C you know offering
42:01
coercing a deal right now if he says

42:03
what they want him to say he gets
42:05
probation they're offering course he how
42:08
do you know this that they're offering
42:10
courses he's suing over okay I have the
42:12
documents I have the documents it was
42:14
leaked to me I have the documents that
42:16
they gave him a script if he reads from
42:18
the script no jail if he doesn't reach
42:21
for the script he gets maybe five years
42:23
and so you are what's the temptation to
42:26
read from the script if you are a guy
42:28
like Cohen who was a lawyer taping his
42:31
own client and lying to him about it
42:33
taping Chris Cuomo and lying to him
42:36
about it stealing money back when he was
42:39
fiercely loyal in this transaction that
42:42
was just uncovered he kept
42:44
\$37,000 because you you guy is a
42:48
complete scoundrel I use your like
42:51
Michael
42:52
not only is Muller saying that is a true
42:54
in the buzz free report
42:56
who cares what Cohen says he's been

42:58
admitted lying over and over again all
43:00
the crimes he's involved in nothing with
43:01
Trump you can't listen to a convicted
43:04
lying scumbag person but the baby's like
43:07
Cohen says Trump sent him to lie it's
43:10
all over for Trump well they're right
43:11
back with Roger stone stay with us info
43:13
wars.com
43:13
news wars.com spread the live links
43:16
defeat the censors victory so of course
43:18
he is under Robert Muller the Third's
43:21
thumb the FBI mafias fixer man and yes
43:26
we know of course he even bragged about
43:27
it but then I ran two FBI agents and
43:29
others over the years including some
43:31
connected to folks at work here family
43:33
members that said Oh cor see ya know
43:35
he's worked for the FBI for 20 years you
43:37
know he's a great guy blahblah covert
43:39
stuff in Europe it's three or four the
43:40
State Department the guys have spooked
43:41
back and forth of different agencies and
43:43
and really from my understanding he used

43:46
that for business connections and things
43:47
he's written a bunch of best-selling
43:49
books he's super smart unless you catch
43:51
him when he can't walk literally and you
43:53
know just the idea that either Muller
43:55
came up with this or The Washington Post
43:57
made it up or of course he made it up
43:59
and there's different combinations of
44:00
those Roger stone you were wanting to
44:02
say something for we hit break about
44:04
Giuliani and then get to that gut level
44:05
you've been all inside this every angle
44:07
we've talked about it you think course
44:09
he made this up not Muller not to defend
44:11
Muller you just think this is like here
44:13
I'll throw you Alex Jones and Roger
44:15
stone I mean Glendon well when this
44:18
usually works of course Alex is that
44:20
after they've been in your emails your
44:22
text messages your phone calls for two
44:24
years they come up with these
44:26
constructed fabricated narratives then
44:29
they suggest the narrative to Jerry and

44:32

Jerry says oh yeah yeah that's how it

44:33

was exactly I'll say that to get off the

44:36

hook so you'll give a stone you'll give

44:38

us Joe and you'll give us David Jones

44:40

Oh Jerry there's one more thing we need

44:43

you to give us Donald J Trump now he

44:46

says oh I wasn't willing to do that well

44:48

what lie is it they wanted him to tell

44:50

about Trump or this fabrication that

44:53

Jerry knew about the WikiLeaks

44:56

disclosures well julian assange

44:59

announced that on CNN in June of 2016

45:01

not exactly a state secret the report he

45:04

repeated it on Fox in August of 2009

45:07

where you see this going where is the

45:09

Russia gate going supposed to be over by

45:11

February now there talk about six more

45:13

months it just never has well the deep

45:16

state is committed to removing this

45:18

president one way or another I'm deeply

45:20

disturbed by this tweet I saw today from

45:22

Donna Brazile you remember her in her

45:24

book she essentially admits that Sara

45:27
was murdered she's now saying speaker
45:29
Pelosi today president Pelosi tomorrow
45:33
now I'm enough of a student of history
45:35
and I wrote a book on the JFK
45:38
assassination the man who killed Kennedy
45:40
the case against LBJ that's how you and
45:43
I met because you read by book and you
45:45
liked it
45:46
and we met at the 50th anniversary of
45:48
the Kennedy assassination and we
45:50
realized we were kindred spirits it's
45:53
not incidental that the the cabinet most
45:57
of the congressional leadership managed
45:58
to be out of town out of the country
46:01
when they whacked John F Kennedy in the
46:03
streets of Dallas so polluted Pelosi and
46:06
93 others including her right-hand
46:08
henchmen the ever unbelievable and
46:12
fraudulent conman congressman Adam
46:14
Schiff were planning to be out of the
46:16
country exactly that's what Trump's got
46:18
to watch it you raised the specter
46:21
yesterday on the show and I already see

46:23
the trolls on Twitter saying Jones and
46:26
stoner crazy when they stalk
46:28
assassination no let's be realistic
46:30
there have been two attempted
46:32
assassinations of in modern times there
46:35
was an attempt to kill President Gerald
46:37
Ford there was an attempt to kill a
46:39
President Ronald Reagan there was there
46:43
were attempts on Trump during the
46:45
presidential campaign I have heard from
46:47
sources in the Secret Service that there
46:49
have been thwarted attempts to kill
46:51
Trump since he's been president it is
46:54
not outside the realm of possibility
46:56
it is not conspiracy theory it is not
46:58
crazy the deep state is perfectly
47:01
capable of this I pray every night for
47:05
the president's safety he's the own
47:07
boring this country to sanity at this
47:10
point and you know Mike Pence is a nice
47:14
enough fellow I'm sure he was a pretty
47:16
good governor but he is just as
47:18
committed to the status quo as Mitch

47:21
McConnell and and Paul Rock be clear the
47:24
only way they can do it in only thing to
47:27
an impeachment to remove them both so
47:28
Pelosi's and third line and gets in
47:30
there is to use the fake election Russia
47:33
gauge meddling canard and that is their
47:35
plan and as you said last week on the
47:38
show they're planning to take Trump out
47:39
and and Pence and put her in now Donna
47:41
Brazile has crawled out from under her
47:43
rock to say that indeed that's the plan
47:45
incredible Roger stone will touch again
47:47
very soon god bless you and Godspeed
47:48
thank you Alex they'll be back ladies
47:51
and gentlemen infowars.com news Wars
47:53
calm spread those links it's how he
47:55
crushed the enemy and thank you for
47:56
doing it John Irvin joins us coming up
47:58
in the next segment for about an hour
48:00
and 45 minutes or sub and he's the guy
48:03
that first took DMT with Joe Rogan he's
48:06
the guy that got Joe Rogan into
48:07
podcasting and it's part of my

48:09
behind-the-scenes investigation into who
48:11
Joe Rogan really is he is one of the
48:14
important places to start right here in
48:18
Austin Texas though is the mother lode
48:21
and I have been massively censored even
48:24
more about YouTube and little sister
48:25
talking about their star player their
48:27
modern Timothy Leary so this is very
48:29
very important information the country
48:31
in the world and how they're seducing
48:33
the young people of the planet and
48:34
that's why I'm gonna do this because Joe
48:37
has proven he's with the globalist now
48:39
he's proven he's with what they're doing
48:41
and he's completely gone over the dark
48:42
side and so fine that's good he's chosen
48:45
his side and we're going to expose it
48:48
but it's not just about job that is all
48:50
coming up now we exclusively learned
48:55
this on air last hour
48:57
there's no news covering it yet it turns
48:59
out the supposed Native American victim
49:02
with the young evil white people

49:04
surrounding him and threatening him
49:06
turns out he's a political operative and
49:08
activist that professionally goes around
49:11
to different campuses starting fights
49:14
and trying to get anyone dressing as a
49:17
Native American band so he's an anti
49:19
free-speech guy this has been the news
49:20
for years and turns out he came over
49:22
with a group of people saying they were
49:24
gonna kill attack the young people he
49:26
didn't do it he just led them over there
49:27
and then they turned it around but no
49:29
violence happened and said that they had
49:31
attacked the old man now people are
49:34
calling for the children to be murdered
49:36
as young as seven prominent Democrats
49:38
are calling for their homes to be docks
49:40
they have been docks to Kathy Griffin
49:41
and others and verified leftist calls
49:43
for mega kids to be fired on school
49:46
burned down and they're not removing
49:50
this off Twitter this is authorized
49:51
calling for their deaths so I'm sure

49:55
Paul Watson or one of the riders is
49:56
gonna get story out about this very soon
49:58
about Nathan Phillips because on air I
50:00
pointed out that they were funding women
50:02
to do this to me a few months ago when I
50:04
was in DC at my own hearings that I
50:07
wasn't allowed to be yet but they're
50:08
about me but they had women funded for
50:10
the cabin all hearings and they were
50:12
coming up cussing yelling calling me a
50:13
subhuman white monkey and then the news
50:16
edit it to say I attack them and and
50:19
it's always now this news doing it it's
50:23
always now this news doing it so beware
50:26
when somebody walks up and goes hey
50:27
subhuman white your mother's married to
50:29
your father you piece of trash
50:30
cave-dwelling monkey wife or scum get
50:34
out of this country you're like man go
50:36
really races eat and then she then cuts
50:38
aside because I'm a veteran I love
50:41
America why are you saying this I'm like
50:43
you just said my mother and my father

50:45
are brother and sister he just called me
50:47
subhuman she's like no I didn't and it's
50:50
because they were with now this setting
50:53
me up
50:53
I'd been on that street corner for 30
50:55
minutes they were inside they came out
50:58
we have the raw footage when
51:00
infowars.com show the true thing and
51:01
this is bigger than just these events
51:03
it's about the media thinks you're so
51:05
dumb they March a leftist funded
51:08
activist into a group of kids wearing
51:10
red white and blue at a pro-life March
51:13
most of them weren't even wearing mega
51:16
hats but they saw the red hats they go
51:19
over to start a fight and then the media
51:21
edits all of that out and says that they
51:23
surrounded the poor native and he goes
51:25
on NPR and says it's horrible what they
51:28
did to me they should get in trouble
51:30
grown men with clubs come over and say
51:32
we're gonna harden
51:33
your organs to seven-year-old kids we're

51:35
gonna Carol you it's like NPR's like oh
51:39
my god they're so sweet
51:41
the horrible white supremacist attacked
51:44
everyone meanwhile when yon urban leaves
51:49
us we are going to get into Israel and
51:52
Iran are going to war that's why Trump's
51:54
really pulling us out as every time
51:56
Israel goes to war the u.s. pulls out of
51:58
the Middle East that's what's really
51:59
happening here we've also got absolute
52:03
evil taking place Google is going to ban
52:05
the terms family after employees argue
52:08
that it's homophobic for families to
52:10
exist
52:11
I'm not kidding that's the Daily Caller
52:12
here's another one Britain's first
52:15
transgender family reveals sun 5 is also
52:17
transitioning because the parents in my
52:20
view are abusing him and so the parents
52:24
think it's okay I guess to chop your
52:25
genitals off it's okay or whatever or
52:27
force drug you so they convince the
52:29
child you're a girl and then do this and

52:31
now they're movie stars so this this is
52:34
pure absolute total evil and all part of
52:37
the depopulation plan now before we get
52:40
into all of that let's have some
52:43
interesting time here Ruth Bader
52:46
Ginsburg has is a globalist anti-gun
52:49
anti-constitution monster but I don't
52:51
wish her any harm but she's been out for
52:54
weeks and the word is she could die any
52:55
time but we have real footage radio
52:58
listeners all described for you of her
53:00
at the hospital she's doing just fine
53:02
let's go and go to that footage
53:04
[Music]
53:10
[Music]

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF COLUMBIA**
4

5 **DR. JEROME CORSI and LARRY**
6 **KLAYMAN,**

7 Plaintiffs,

8 vs.

9 **INFOWARS, LLC, FREE SPEECH SYSTEMS,**
10 **LLC, ALEX E. JONES, DAVID JONES, and**
11 **OWEN SHROYER,**

12 Defendants.

CIVIL ACTION NO. 1:19-cv-00656-ESH

[PROPOSED] ORDER

13 Upon consideration of Defendants' Motion to Dismiss, the Court, having
14 considered same, and all papers and argument in connection therewith, finds that the
15 Court lacks personal jurisdiction over the Defendants, venue is improper in this Court,
16 and the interests of justice do not warrant a transfer, and, further, that Plaintiffs have
17 failed to state a claim, and

18 **IT IS HEREBY:**

19 **ORDERED** that the Motion to Dismiss is hereby **GRANTED**; it is

20 **FURTHER ORDERED** that this matter is **DISMISSED with PREJUDICE.**

21 **SO ORDERED.**

22 Dated this ____ day of _____, 2019.

23
24
25 _____
26 Hon. Ellen S. Huvelle
27 United States District Judge

Copies to:

Larry E. Klayman
Klayman Law Group, P.C.
2020 Pennsylvania Ave., NW #800
Washington, DC 20006
leklayman@gmail.com
Counsel for Plaintiffs